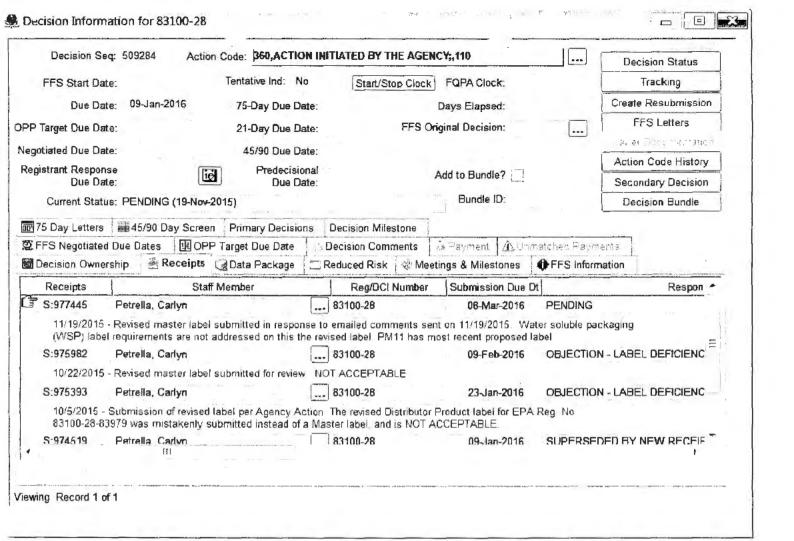
EPA Reg. Jacket 83100-28 vol 2



Rate, Debra

From: Sent: Anna Armstrong <Anna@wagnerreg.com> Thursday, November 08, 2018 2;30 PM

To:

Rate, Debra

Cc:

Kt Woodall; James Wagner; Anna Armstrong; Carrie Nolan; Johnson, Marion; Walsh, Michael

Subject: Attachments: FW: Agency Letter: EPA Reg. Nos. 83100-27 and 83100-28 EPA Reg No 83100-27 and -28 cerified letter disclosure pdf

Hi Debra,

We confirm receipt on behalf of Rotam.

Thanks and take care,

Anna

From: Rate, Debra [mailto:Rate.Debra@epa.gov]
Sent: Thursday, November 08, 2018 9:41 AM
To: Kt Woodall ktwoodall@wagnerreg.com

Cc: Johnson, Marion < Johnson. Marion@epa.gov>; Walsh, Michael < Walsh. Michael@epa.gov>

Subject: Agency Letter: EPA Reg. Nos. 83100-27 and 83100-28

Dear Ms. Woodall-

Attached please find a letter from the Agency (dated 11/7/2018) regarding your methomyl products, EPA Reg. Nos. 83100-27 and 83100-28.

Please note that this letter has also been sent to you via certified mail.

Please confirm receipt of this email and the attached letter.

Regards,

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

BY CERTIFIED MAIL AND EMAIL

November 7, 2018

Re: EPA Registration No. 83100-27 and 83100-28.

Dear Submitter of methomyl information:

Pursuant to 40 C.F.R. section 2,209(d), I am writing to inform you that EPA will likely soon disclose documents to the parties and the Court in the case of Center for Biological Diversity, et al. v. U.S. Environmental Protection Agency, et al., Case No. 3:11-CV-293-JCS (U.S. District Court for the Northern District of California). The documents are being produced as part of the Administrative Records of the decisions at issue and include documents that registrants or other data-submitters may have submitted to EPA regarding the pesticide methomyl, and that may be subject to various release restrictions under federal law. The information includes documents submitted with pesticide registration applications and may include confidential business information (CBI) as well as scientific studies subject to the disclosure restrictions of section 10(g) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

All documents that may be subject to release restrictions under federal law are designated as "Confidential or Restricted Information" under a protective order issued by the Court on October 11, 2018. The protective order precludes public disclosure of any such documents by the parties in this action who have received the information from EPA, and limits the use of such documents to litigation purposes only. If any of the parties were to file these documents with the Court, such documents would be filed under seal and would not be available for public review, unless the information contained in the document is not subject to section 10(g) of FIFRA and all CBI has been redacted. At the conclusion of the litigation, record material EPA designates as "Confidential or Restricted Information" would be returned to EPA. EPA will disclose these documents to the parties or the Court only as provided in the Court's approved protective order.

If you have any questions about this letter, please contact Michele Knorr in EPA's Office of General Counsel at (202) 564-5631.

Sincerely,

Marion J. Johnson, Chief

Invertebrate and Vertebrate Branch 2

Registration Divison

Office of Pesticide Programs

Environmental Protection Agency

Summary Information For Company 83100, ROTAM AGROCHEMICAL COMPANY, LTD.

Company No:

83100

Company Name:

ROTAM AGROCHEMICAL COMPANY, LTD.

Division Name:

Office Name:

Branch Name:

Agent Name:

WAGNER REGULATORY ASSOCIATES, INC.

Agent Contact:

MS. CARRIE NOLAN

Agent Phone:

(302) 635-7281

Official Address:

PO Box 640

HOCKESSIN, Delaware 197070640

UNITED STATES

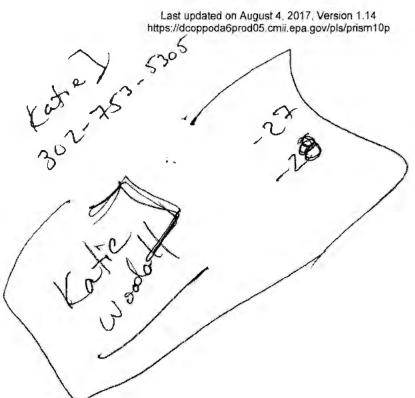
Date of Current Update:

14-Jun-2018

Reason for Current Update: Letter from Company

EPA Home | OPP-Home | Search | Help

Last updated on August 4, 2017, Version 1.14





First-Class Mail Postage & Fees Paid USPS Permit No. G-10

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Debra Rate
U.S. Environmental Protection Agency
Office of Pesticide Programs
Division Mail Code (7505P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

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United States
Environmental Protection Agency
Washington, DC 20460

Official Business Penalty for Private Use \$300 First Class Postage and Fees Paid EPA G-35

Ms. Katie Woodall, Agent Rotan Agrochemical Company, Ltd. 40 Nagner Regulatory Associates, Inc. 7217 Lancaster Pika, Suite A Hockessin, DE 19707

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
 Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse 	A. Signature X
 so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	B. Received by (Printed Name) C. Date of Delivery
1. Article Addressed to: Ms. Katie Woodall, Agent Rotam Agrochemical Company clo Wagner Regulatory Assoc., I	D. Is delivery address different from item 1?
7217 Lancaster Pike, Swite F Hockessin, DE 19707	3. Service Type Certified Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.
	4. Restricted Delivery? (Extra Fee) Yes
Article Number (Transfer from service label)	7

PROCESSING REQUEST

Reg #83100-28	Decision #536083
Description: Revised Basic	CSF
Revised Alt.#1	l CSF
Electronic Label & Letter (see PPLS):	Non Electronic OR Label & Letter (Scanning required):
☐ Dated:	☐ Dated:
Only one label	type should be selected
Other Materials Sent (set X) Revised CSF(s) Dated: basic dated 10/1/2018	ee jacket): c CSF dated 10/1/2018; Alt. CSF #1
Other:	
and clipped together, NOT STAPLED. T materials to staff in the Information Se	rials in the jacket. It must be well organized hen give the jacket with the coversheet and rvices Center (ISC) (Room S-4900). If a age, please file materials in a new jacket and information please call 703-605-0716.
Reviewer: Debra Rate	
Division: RD	
Phone: (703) 306-0309	Date10/16/2018



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 1, 2018

Katie Woodall, Agent Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associated, Inc. P.O. Box 640 Hockessin, DE 19707

Subject: CSF Notification per PRN 98-10 – Adding Additional Production Sites (Basic

and Alternate CSF#1)

Product Name: Rotam Methomyl 90SP Insecticide

EPA Registration Number: 83100-28 Application Date: October 31, 2017

Decision Number: 536083

Dear Ms. Woodall:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 10/01/2018
- Alternate CSF#1 dated 10/01/2018

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Debra Rate at (703) 306-0309 or by email at rate.debra@epa.gov.

Sincerely,

Michael Walsh, Product Manager 11 Invertebrate & Vertebrate Branch 2

Registration Division (7505P) Office of Pesticide Programs

Duffac (fer)

Rate, Debra

From: Sent:

Kt Woodall < ktwoodall@wagnerreg.com> Monday, October 01, 2018 8:11 AM

To:

Rate Debra

Cc:

Anna Armstrong

Subject:

RE: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Attachments:

83100-28 - Basic CSF - 01Oct2018.pdf; 83100-28 - Alt. 1 CSF - 01Oct2018.pdf

Thanks Debra - Revised CSFs attached.

Warmest regards,

Katie Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodall@wagnerreg.com | 302-753-5305

From: Rate, Debra [mailto:Rate.Debra@epa.gov] Sent: Monday, October 01, 2018 7:57 AM

To: Kt Woodall < ktwoodall@wagnerreg.com> Cc: Anna Armstrong <Anna@wagnerreg.com>

Subject: RE: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Hi, Kt-

I would like to get this action completed, as soon as possible, so please send the corrected CSFs to me and I can process them.

Thank you.

Debra

Debra Rate, Ph.D. Senior Regulatory Specialist Invertebrate & Vertebrate Branch 2 Registration Division U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Monday, October 01, 2018 7:48 AM To: Rate, Debra < Rate. Debra@epa.gov> Cc: Anna Armstrong < Anna@wagnerreg.com>

Subject: RE: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Good Morning Debra - Hope you had a wonderful weekend.

O

Am I able to email you the revised CSF? Rotam has informed me they no longer use the highlighted alternate

*Inert ingredient information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment

Thanks for all your help!

Warmest regards,

Katie Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodall@wagnerreg.com | 302-753-5305

From: Rate, Debra [mailto:Rate.Debra@epa.gov]
Sent: Thursday, September 27, 2018 7:42 AM
To: Kt Woodall ktwoodall@wagnerreg.com
Cc: Anna Armstrong Anna@wagnerreg.com

Subject: RE: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Good morning,

Yes. Those are the that are not in the Agency's database.

Let me know how you wish to proceed. (Note: If you choose to remove them from the CSFs at this time, don't forget that they are listed on page 1 and the attachment (pg. 2)).

Regards, Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Thursday, September 27, 2018 7:25 AM **To:** Rate, Debra < Rate. Debra@epa.gov>

Cc: Anna Armstrong < Anna@wagnerreg.com>

Subject: RE: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Morning Debra - Thanks for your call yesterday.

Just want to confirm the 3 films not approved, highlighted below -



Thanks!

Warmest regards,

Katie Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodall@wagnerreg.com | 302-753-5305

From: Rate, Debra [mailto:Rate.Debra@epa.gov]
Sent: Wednesday, September 26, 2018 5:21 PM
To: Kt Woodall ktwoodall@wagnerreg.com

Subject: FW: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Hi, Kt-

Richard forwarded me your message from yesterday about the notification.

I've been working on your notification and came across an issue with inert ingredients that is outlined in the attached Agency initiated letter. That said, I can't move forward with and approve the notification.

Regards, Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Tuesday, September 25, 2018 11:39 AM To: Gebken, Richard < Gebken, Richard @epa.gov>

Subject: FW: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Good Afternoon Richard - Following up on the below. Thanks!

Warmest regards,

Katie Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodall@wagnerreg.com | 302-753-5305 From: Kt Woodall

Sent: Wednesday, September 12, 2018 8:10 AM To: Walsh, Michael < Walsh. Michael@epa.gov >

Subject: FW: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Morning Michael - I may have inadvertently sent the below to Richard, thinking he was the PM for this product.

Please let me know if you have some insight. Thanks!

Warmest regards,

Katie Woodall

Wagner Regulatory Associates, Inc. 7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodall@wagnerreg.com | 302-753-5305

From: Kt Woodall

Sent: Wednesday, September 12, 2018 8:00 AM

To: EPA - Richard Gebken, PM 10 < Gebken.Richard@epa.gov>

Cc: Anna <anna@wagnerreg.com>

Subject: Rotam Methomyl 90SP Insecticide - 83100-28 - CSF Notification

Importance: High

Good Morning Richard – Sorry to bother you. Rotam has reached out this morning regarding a pending CSF notification that is considered business critical.

Are you able to provide a status update for 83100-28 – submitted October 31, 2017, adding additional producers (attached)?

Thank you so much for your time!

Warmest regards,



Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 ktwoodail@wagnerreg.com | 302-753-5305

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Notification

Inert ingredient information may be entitled to confidential treatment

9/26/18

- Alternate

- Not Approved or in Inext database.

- Agency initiated letter sent to resistant (Kt. Woodali)

- Kt. Will let Debra know how they will proceed. (ie. remove or provide composition)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 26, 2018

Katie Woodall, Agent Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associated, Inc. P.O. Box 640 Hockessin, DE 19707

Subject:

Agency Initiated Action -CSFs have unapproved inert

Product Name: Rotam Methomyl 90SP Insecticide

EPA Registration Number: 83100-28

Dear Ms. Woodall:

As a result of the review of the 10/31/2017 CSF notification submitted to the Agency by Keeva Shultz, it has come to the Agency's attention that the CSFs for EPA registered product 83100-28 contain unapproved alternate (the last three listed are not approved). This can be resolved by one of two methods:

- 1. Have the manufacturer of the unapproved alternate provide the Agency with the appropriate information (e.g., full ingredient disclosure) for approval and placement into the Agency's inert database.
- Remove all references to the unapproved alternate from all CSFs and resubmit to the Agency.

Please provide appropriate inert information for approval or submit revised CSFs (Basic CSF and Alt. CSF#1) removing these alternate within 10 days of the date of this letter. If you have any questions, please contact me, by phone at 703-306-0309, or via email at rate.debra@epa.gov.

Sincerely,

Debra Rate, Acting Product Manager 11 Invertebrate & Vertebrate Branch 2 Registration Division (7505P)

Registration Division (1303F)

Inert ingredient information may be entitled to confidential treatment

Rate, Debra

From:

Debesai, Alganesh

Sent:

Thursday, September 20, 2018 10:01 AM

To: Cc: Rate, Debra Leifer, Kerry

Subject:

RE: Confirmation that the Agency has enough information on these inerts for use in

pesticides?

Correct.

Alga

Alganesh Debesai Chem, Inerts & Tox Assessment Branch (CITAB) Registration Division (Mail Code: 7505P) Office of Pesticide Programs US Environmental Protection Agency P: (703) 308-8353 debesai.alganesh@epa.gov

Office Location: One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

Mailing Address: 1200 Pennsylvania Ave, NW Washington, DC 20460-0001 http://www.epa.gov/pesticides



From: Rate, Debra

Sent: Thursday, September 20, 2018 10:00 AM

To: Debesai, Alganesh < debesai.alganesh@epa.gov>

Cc: Leifer, Kerry < Leifer. Kerry@epa.gov>

Subject: RE: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Thanks, Alga. OK, then these inerts must come off of the CSFs or they must provide the composition of these inerts for our approval.

Thanks again!

Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Debesai, Alganesh

Sent: Thursday, September 20, 2018 9:52 AM

To: Rate, Debra < Rate. Debra@epa.gov>
Cc: Leifer, Kerry < Leifer. Kerry@epa.gov>

Subject: RE: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Hi Debra.

Sorry, I forgot to mention vesterday that we only have the information for information for

We do not have the

Thanks

Inert ingredient information may be entitled to confidential treatment

Alga

Alganesh Debesai Chem, Inerts & Tox Assessment Branch (CITAB) Registration Division (Mail Code: 7505P) Office of Pesticide Programs US Environmental Protection Agency P: (703) 308-8353 debesai.alganesh@epa.gov

Office Location: One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

Mailing Address: 1200 Pennsylvania Ave, NW Washington, DC 20460-0001 http://www.epa.gov/pesticides



From: Debesai, Alganesh

Sent: Wednesday, September 19, 2018 4:19 PM

To: Rate, Debra < Rate. Debra@epa.gov > Cc: Leifer, Kerry < Leifer. Kerry@epa.gov >

Subject: RE: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Hi Debra,

CSF Notifications do not need inert review and no need to see the CSFs.

Thanks

Alga

From: Rate, Debra

Sent: Wednesday, September 19, 2018 3:07 PM

To: Leifer, Kerry < Leifer. Kerry@epa.gov>

Cc: Debesai, Alganesh <debesai.alganesh@epa.gov>

Subject: RE: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Were there any thoughts as to whether I can approve the CSF notifications with these inerts as they are listed on the CSF? Please let me know if you want / need to see the CSFs.

Thanks for your help. Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

From: Leifer, Kerry

Sent: Thursday, September 13, 2018 9:54 AM
To: Rate, Debra <Rate.Debra@epa.gov>

Cc: Debesai, Alganesh < debesai.alganesh@epa.gov>

Subject: RE: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Hi Debra.

I sent you an email yesterday noting that is simply the which is an acceptable inert ingredient. I did not verify each of the alternatives at that time, but in checking further, we do have as an acceptable inert in OPPIN but the other trade names do not appear to be listed in OPPIN. I am copying Alga on this email as she may have some additional information on those other three tradenames.

Kerry

Kerry Leifer, Team Leader
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (703) 308-8811

tel: (703) 308-8811 fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Rate, Debra

Sent: Wednesday, September 12, 2018 4:23 PM

To: Leifer, Kerry < Leifer. Kerry@epa.gov>

Subject: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Hi, Kerry-

Did you have a chance to confirm that we have all of the information that we need for the ingredients below?

Inert ingredient information may be entitled to confidential treatment

Thanks for your help. Debra

Debra Rate, Ph.D.
Senior Regulatory Specialist
Invertebrate & Vertebrate Branch 2
Registration Division
U.S. Environmental Protection Agency

Phone: 703-306-0309

Inert ingredient information may be entitled to confidential treatment

Rate, Debra

From: Leifer, Kerry

Sent: Wednesday, September 12, 2018 10:40 AM

To: Rate, Debra

Cc: Debesai, Alganesh
Subject:

Debra,

Kerry

Kerry Leifer, Team Leader
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (702) 308-8811

tel: (703) 308-8811 fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

Rate, Debra

From:

Leifer, Kerry

Sent:

Thursday, September 13, 2018 9:54 AM

To: Cc: Rate, Debra

Debesai, Alganesh

Subject:

RE: Confirmation that the Agency has enough information on these inerts for use in

pesticides?

Hi Debra,

I sent you an email yesterday noting that

which is an

acceptable inert ingredient. I did not verify each of the alternatives at that time, but in checking further, we do have as an acceptable inert in OPPIN but the other trade names

appear to be listed in OPPIN. I am copying Alga on this email as she may have some additional information on those other three tradenames.

Kerry

Inert ingredient information may be entitled to confidential treatment

Kerry Leifer, Team Leader Chemistry, Inerts and Toxicology Assessment Branch Registration Division (7505P) Office of Pesticide Programs U.S. Environmental Protection Agency 1200 Pennsylvania Ave. NW Washington, DC 20460

tel: (703) 308-8811 fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Rate, Debra

Sent: Wednesday, September 12, 2018 4:23 PM

To: Leifer, Kerry < Leifer. Kerry@epa.gov>

Subject: Confirmation that the Agency has enough information on these inerts for use in pesticides?

Hi, Kerry-

Did you have a chance to confirm that we have all of the information that we need for the ingredients below?



Thanks for your help.

Debra

Inert ingredient information may be entitled to confidential treatment

Debra Rate, Ph.D. Senior Regulatory Specialist Invertebrate & Vertebrate Branch 2 Registration Division

U.S. Environmental Protection Agency

Phone: 703-306-0309

Please read instructions on revers	se before completing form	1.	For	m Appro	oved OMB No.		60. Approval	expires 05	31-98
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	Washington,			✓	Other				
1. Canana and Dan don't North and	Appli	cation for	Pesticide - S	_					
1. Company/Product Number 83100-28			2. EPA Product	•		3. F	Proposed CI	assificatio	on
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4. Company/Product (Name)			PM#			X	None [Rest	ricted
Rotam Agrochemical Co. Ltd.				10					
Rotam Methomyl 90SP Insect									
Name and Address of Appl Rotam Agrochemical Co. L		le)	6. Expedited Re (b)(l), my produc						
c/o Wagner Regulatory As			to:						
P.O. Box 640 Hockessin, DE 19707									
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Amendment - Explain be	low.		Final print		s in response t	to			-
Resubmission in respons	se to Agency letter dated		☐ Agency le _ ☐ "Me Too".						-
Notification - Explain belo	ow.		Other - Ex	oplain be	elow.				
Explanation: Use additional									
Notification adding an additio Notice 98-10 and EPA regulat									
of formula of this product. I ur	nderstand that it is a v	iolation of 18	3 U.S.C. Sec. 1001	to willf	fully make an	y false s	statement to	EPA. I fo	urther
understand that if this notificat of FIFRA and I may be subjec	tion is not consistent w to enforcement action	vith the terms n and penaltic	s of PR Notice 98-1 es under sections 1	0 and 4 2 and 1	40 CFR 152.4 14 of FIFRA.	46, this	product may	be in vio	lation
			ction - III						
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Contact Point (Complete ite Name	ems directly below for i	<u>identification</u>	of individual to be o		<i>ed, if necessa</i> ohone No. (In			pplication	1.)
Keeva Shultz		Rotam Agroo	chemical Co. Ltd.		635-7281 (k			om)	
I certify that the statements I hav	Certific		s thoroto are true acc	nurate a	nd complete		e Applicatio ceived	n	
I acknowledge that any knowingly						1,60	Cived		
both under applicable law.		7 T:u -			. 		(Stamp	ed)	
2. Signature Alle To Shu	Eta	3. Title	Potom Agrochomi	100.14	ы	[
			Rotam Agrochemica	CO. LI	iu.				
4. Typed Name		5. Date	2017						
Keeva Shultz		October 31	31, 2017						

E-Submission

October 31, 2017

Document Processing Desk (NOTIF) ATTN: Richard Gebken, PM Team 10 Registration Division (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Dear Mr. Gebken;

Subject: Rotam Methomyl 90SP Insecticide, EPA Reg. No. 83100-28 - Notification

Wagner Regulatory Associates, Inc., as agent for Rotam Agrochemical Company Ltd., respectfully submits the enclosed CSF Notification to add an additional production facility to the Confidential Statement of Formulas. The revised Basic & Alternate #1 CSFs will replace all CSFs on file. In support of this notification, the following documents are enclosed:

- Letter from Rotam Agrochemical Company Ltd. appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Notification (8570-1)
- Confidential Statement of Formula (8570-4) Basic & Alternate #1
- Formulators Exemption (8570-27)

If you have any questions about this submission please contact the undersigned at 302-635-7281 or keeva@wagnerreg.com.

Respectfully submitted,

Keeva Shulty

Keeva Shultz

Rotam Agrochemical Company Ltd.

Enclosures



United States

Environmental Protection Agency Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address Rotam Agrochemical Company, Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707	Product Name Rotam Methomyl 90SP Insecticide				
	As an authorized representative of the applicant for registration of (1) This product contains the following active ingredient(s):	f the product identified above, I certify that:			
Methomyl					

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient Methomyl	Product Name	Registration Number
Signature **Xelute Shulty** EPA Form 8570-27 (Rev. 06-2004)	Name and Title Keeva Shultz- Agent for Rotam Agrochemical Company	Date 10/31/2017
Clua) hulty EPA Form 8570-27 (Rev. 06-2004)	Company	Copy 1 – EPA

Copy 1 – EPA Copy 2 - Applicant copy

Paperwork Reduction Act Notice	
The public reporting burden for this collection of information is estimated to average 1.5. hours per response, including familiarization with the form, organizing the necessary information, and completing the form. Send any comments regarding the burden estimate or any other aspect of this collection of information to: Director Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.	d ;,
EPA Form 8570-27 (Rev. 06-2004) Reverse Copy 1 - EPA Copy 2 - Applicant copy	



May 23, 2017

To: Whom it May Concern

Re: ROTAM AGROCHEMICAL COMPANY LIMITED (Firm Number: 83100)

This letter serves as notification that ROTAM AGROCHEMICAL COMPANY LIMITED has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding state and/or federal regulatory matters as determined by ROTAM AGROCHEMICAL COMPANY LIMITED. The following employees of Wagner Regulatory Associates, Inc. are authorized to act on our behalf:

James Wagner Cheryl Wagner

Email: <u>james@wagnerreg.com</u> Email: <u>cheryl@wagnerreg.com</u>

Phone: 302-635-7290 Phone: 302-635-7289

Anna Armstrong Barbarette Young-Henry

Email: anna@wagnerreg.com Email: barbarette@wagnerreg.com

Phone: 302-510-0039 Phone: 302-635-7279

Carrie Nolan Katie Woodall

Email: carrie@wagnerreg.com Email: ktwoodall@wagnerreg.com

Phone: 302-635-7632 Phone: 302-635-7283

Catherine Parmeter Keeva Shultz

Email: catherine@wagnerreg.com Email: keeva@wagnerreg.com

Phone: 410-920-8756 Phone: 302-635-7281

Correspondence can be addressed to any of the above employees at:

Wagner Regulatory Associates P. O. Box 640 Hockessin, DE 19707-0640



Thank you for your time and assistance. Please feel free to contact Wagner Regulatory Associates should you have any questions.

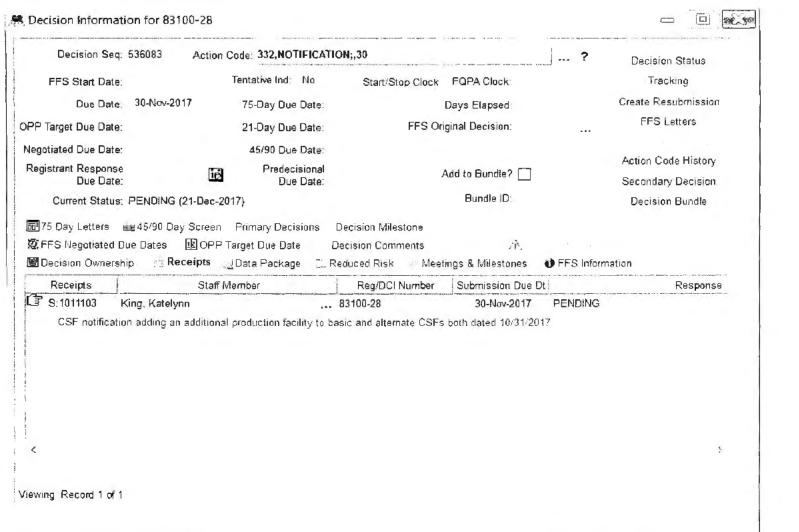
Respectfully submitted,

Yifan Wur

Head of Research, Development and Registration Division ROTAM AGROCHEMICAL COMPANY LIMITED

Tel: 86-512-5790 3076 Fax: 86-512-5771 8692 Email: yifanwu@rotam.com

cc: WRA, Inc.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 12, 2017

Ms. Cheryl Wagner, Agent Rotam AgroChemical Company Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box640 7217 Lancaster Pike, Suite A Hockessin, DE 19707

Subject:

Condition of Registration - Storage Stability and Corrosion Characteristics Data

Product Name: Rotam Methomyl 90SP Insecticide

EPA Registration Number: 83100-28 Application Date: January 10, 2012

Decision Number: 460550 MRID Number: 487170-01

Dear Ms. Wagner:

The Agency has reviewed the study submitted to fulfill the conditional data requirement referred to above, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act. A copy of the review is enclosed. The study has been classified as acceptable. The condition of registration is considered fulfilled.

If you have any questions, please contact me by phone at (703) 308-2972, or via email at walsh.michael@epa.gov.

Sincerely,

Michael Walsh

Product Manager 11

Invertebrate & Vertebrate Branch 2

Registration Division

Office of Pesticide Programs

Enclosure

Please read instructions on reven	se before co ting fo	m.			Form Apr	Drove.	JMB No.	2070-006	O. Approvel expires 2-28-9
ŞEPA €n	United vironmental Pro Washington	tection		ency		7	Registr Amend Other		OPP Identifier Number
	Арр	lication	for	Pestici	de - Sec	tion	1		
Company/Product Number Rotam Agrochem Internati	onal Company Ltd	83100		1	Product Man Hebert	ager		1	oposed Classification
4. Company/Product (Name) Rotam Methomyl 90SP i	nsecticide (83100-2	28)		PM# 7					None nestricted
5. Name and Address of Applicar ROTAM Agrochemical Company L C/O IPM Resources LLC (Agent) 4032 Crockers Lake Blvd., Suite 8' Sarasota, FL 34238	imited 18			(b)(i), n to: EPA F	ny product i	is simi	ilar or iden	tical in co	FIFRA Section 3(c)(3) mposition and labeling
			Se	ction -					
Arnendment - Explain below Resubmission in response Notification - Explain below Explanation: Use additional pa	to Agency letter dated w. age(s) if necessary. (Fo	or section i			Finel printed Agency lett "Me Too" A Other - Expl for Rotam M	er dete Applica Isin be	ed ition. low.		63100-28)
Material This Product Will Be P	eckaged In:		Sec	tion - I	<u>II</u>				
Yes V No * Certification must he submitted	t Packaging wgt. con	. per ntainer 6/4 /case	If "Ye Packs	Yes No es" age wgt	No. per container		2. Type of	Metel Plastic Glass Paper Other (S	pacify)
3. Location of Net Contents Inform	nation 4. Si	ze(s) Retei					Lation of La	bel Directio	ns
Manner in Which Label is Affix Printed or glued	1	Lithogra Paper gl Stencile	ph ued d		Other	_			
			Sec	tion - I'	V				
1. Contact Point (Complete items	directly below for idea	ntification	of indi	vidual to be	contacted,	if nece	ssary, to p	ocess this	application.)
Name Frank E. Sobotka, Ph.D.			itte Agent					Telephone 215 497	No. (Include Ares Code) -9501
i certify that the statements i acknowledge that any kno both under applicable law.	I have made on this f		attac						6. Date Application Received (Stamped)
2. Signature	3/-gl	1	Tide Agent						
4. Typed Name Frank E. Sobotka, Ph.D.		5.	Date	0	1/10	1:	2012		



4032 Crockers Lake Blvd., Suite 818, Sarasota, FL 34238 Phone: (215) 497-9501 Fax: (215) 497-9502

"an intellectual property management resource company"

January 10, 2012

VIA UPS EXPRESS

Hebert.John@epa.gov [REF. **25** 1 - 703-308-6249]

Document Processing Desk Office of Pesticide Programs (7504P) U. S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501 ATTN: John Hebert (PM7)

SUBJECT: Submission Storage Stability (830.6317) and Corrosion Studies (830.6320)

Rotam Methomyl 90SP Insecticide (83100-28)

Dear Mr. Hebert:

The purpose of this letter is to transmit to the Agency the Storage Stability and Corrosion Studies on behalf of ROTAM AGROCHEM INTERNATIONAL COMPANY LTD for the above registered product. Please find enclosed the following:

Administrative Materials: (MRID No.: 487/70-01)

Transmittal Form (EPA Form 8570-1) for the subject product.

Three copies each of the following:

SUBJECT: Submission of Stability and Corrosion Studies -Rotam Methomyl 90SP Insecticide Continued

VOLUME NO.	DESCRIPTION	OPPTS GUIDELINE REF. NO.	MRID NO.
7	Ambient Temperature Shelf Life with Corrosion Characteristic of Methomyl 90SP Insecticide (Methomyl 900 g/kg water soluble powder) [Rotam Report ID: 0733]	Guideline: 830.6317 830.6320	487170-CV

If you have any questions or need additional information, please do not hesitate to contact us at any time.

Sincerety yours,

Frank E. Sobotka, PA Senior Partner

IPM Resources LLC (Agent)

ATT:

LHM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DATE OUT:	August 10, 2017
SUBJECT:	STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS (830.6320) REVIEW ACCELERATED STUDY []; ONE YEAR STUDY [X]; OVER 1 YEAR STUDY [] MP [] EP [X] EUP [] DP BARCODE No.: 398542 REG. No.: 83100-28 DECISION No.: 460550 MRID No(s): 487170-01 PRODUCT NAME: ROTAM METHOMYL 90SP INSECTICIDE COMPANY: ROTAM AGROCHEMICAL COMPANY LIMITED Brunk The
FROM:	Linda Mascall / Bruce Kitchens Lunda W (us ceall Product Chemistry Team Chemistry, Inerts and Toxicology Assessment Branch (CITAB)/RD (7505P)
TO:	Michael Walsh / Michael Walsh, RM 11 Invertebrate and Vertebrate Branch 2 / RD (7505P)
I. CONCLUS	IONS:
[X] ACCE	E STABILITY (830.6317): PTABLE CEPTABLE* ADEABLE*
40CFR158.1	90 DATA REQUIREMENT: [X] SATISFIED [] NOT SATISFIED
[X] ACCE	ON CHRACTERISTICS (830.6320): PTABLE CEPTABLE* ADEABLE*
40CFR158.1	90 DATA REQUIREMENT: [X] SATISFIED [] NO [SATISFIED
* If unaccepta	able or upgradeable describe the deficiency and provide recommendations

Page 1

Comments & Recommendations:

The study on the storage stability of Methomyl 900 g/kg Water Soluble showed that the test substance was stable on storage without any significant change in the active ingredient content, the physical state, color, odor, acidity pH of a dilution and corrosion characteristics. When observed for the corrosion characteristics, no significant change in the condition of the package was observed during the storage for one year at 20.2°C - 26.8°C with humidity 27.9% - 88.2%. The polyethylene inner bags with outer aluminum foil bags as the commercial packing was found to be stable without any leak or deterioration during the storage period and no loss in weight observed. The study shows that the test substance packed in its commercial package (water soluble bag with outer a sealed aluminum foil bag) was stable on storage for a period of one year.

II. STUDY SUMMARY

A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

[X] Yes [] No

B. PRODUCT INFORMATION

Active ingredient(s): Methomyl
Label claim(s) Nominal concentration(s) (%): 90
Initial concentration(s) of the Al(s) (%) used in the study: 90.52
Lower certified limits (%) based on Al % on the label: 87.3
Lower certified limits (%) based on Al % in the study: 87.8044

C. EXPERIMENTAL PARAMETERS

Temperature: [] Freezer; Room []; Warehouse [X]; 54°C []; Other [] Humidity: Indicate 25°C / 50% (if provided)
Duration of study: [X] 1 year; [] over 1 year
Type of container: [] Glass; [] Metal; [] HDPE; [] Fluorinated HDPE; [] Other Analysis at intervals: [X] 0 (initial);
[X] 3 months; [X] 6 months
[X] 9 months; [X] 12 months
[] Over 12 months

Page 2

D. ANALYTICAL METHOD

Method	DETECTOR			
Gas chromatography (GC)	 □ FID (Flame Ionization Detector) □ ECD (Electron Capture Detector) □ N/P (Nitrogen/Phosphorous Detector) □ Other 			
Capillary Gas chromatography (CGC)	 ☐ FID (Flame Ionization Detector) ☐ ECD (Electron Capture Detector) ☐ N/P (Nitrogen/Phosphorous Detector) ☐ Other 			
High Pressure Liquid chromatography (HPLC)	√ UV/VIS - 254 (nm)□ RI (Refractive Index)□ Other			
GC-MS / LC-MS	Specify			
Other	Specify			

E. RESULTS

PARAMETERS	TEST RESULTS					
	Initial month (before storage)	90.52% (905.2 g/kg)				
Active Ingredient	3 rd month	90.27% (Degradation 0.28%				
	6 th month	90.05% (Degradation 0.52%				
Content	9 th month	90.60% (Degradation -0.09%)				
	12 th month	89.90% (Degradation 0.68%)				
Corrosion Characteristics	Container remained stable without any damage and no significant weight change was observed					

	Action Code: 570,CONDITIONAL	REGISTRATION FOLLOW-UP;DA.A REQI ?	Decision Status
FFS Start Date:	Tentative Ind: No	Start/Step Clock FQPA Clock:	Tracking
Due Date: 01-May-	2012 75-Day Due Date:	Days Elapsed:	.* :
PP Target Due Date:	21-Day Due Date:	FFS Original Decision:	FFS Letters
egotiated Due Date:	45/90 Due Date:		
Registrant Response	Predecisional Due Dete	Add to Bundle?	Action Code History
Due Date:	Due Date:		Secondary Decision
Current Status: COMPLE	TED (12-Sep-2017)	Bundle ID:	Decision Bundle
submission document	being reassigned to PM11 for s related to this action could confirmed that they had not	d be located in the jacket or	
regarding this action f	rom the Agency. As requeste ocuments, and the action wa	ed, the agent provided the is closed by me with the	
	s in the product jacket. The sh, 9/12/2017	conditional data is	
appropriate document		conditional data is	

NOTE TO: FILE

SEE COMMENTS ABOVE & THE
ATTACHED EMATL SUBMISSIEN
HISTORY.

M. WARSA 9/12/17

Walsh, Michael

From:

Walsh, Michael

Sent:

Tuesday, September 12, 2017 11:23 AM

To: Cc: 'Kt Woodall' Cheryl Wagner

Subject:

83100-28. Acceptance letter for conditional data.

Attachments:

83100-28 SSCC Conditional Data Accepted 20170912 PWP.pdf

Hi Katie.

Attached please find the Agency decision letter accepting the Storage Stability & Corrosion Characteristics conditional data for 83100-28. In the same attachment is the Chemistry Review. Because the attachment may contain confidential information, the document has been encrypted and password protected. I will send you the password in a separate email.

Thank you for your assistance with this matter.

ENCRYPTOD COMMUNICATION

Mike

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Tuesday, September 12, 2017 10:15 AM
To: Walsh, Michael < Walsh. Michael @epa.gov>
Cc: Cheryl Wagner < cheryl @wagnerreg.com>

Subject: RE: E-submission documents. RE: 83100-28. Agency letter for conditional data.

Thanks Mike - Please see the attached.

Katie Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 KtWoodall@wagnerreg.com katie@wagnerreg.com RESUBMISSION OF ORTHONAR

DOCUMENTS.

From: Walsh, Michael [mailto:Walsh.Michael@epa.gov]

Sent: Tuesday, September 12, 2017 9:25 AM
To: Kt Woodall < ktwoodall@wagnerreg.com
Cc: Cheryl Wagner < cheryl@wagnerreg.com>

Subject: E-submission documents. RE: 83100-28. Agency letter for conditional data.

Hi Katie.

I have a review back from the Chemistry Team for the conditional data, and would like to close the action this week, if possible.

Would you please provide me with electronic copies of the submission documents. They would be dated 1/10/2012 or around that date.

Thank you.

Mike

From: Kt Woodall [mailto:ktwoodall@wagnerreg.com]

Sent: Tuesday, September 12, 2017 7:40 AM
To: Walsh, Michael < Walsh.Michael@epa.gov > Cc: Cheryl Wagner < cheryl@wagnerreg.com >

Subject: RE: 83100-28. Agency letter for conditional data.

Good Morning Michael – Does not appear we've received the Storage Stability & Corrosion acceptance letter. Please forward at your earliest convenience.

Thanks!

Katie Woodall

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A Hockessin, DE 19707 KtWoodall@wagnerreg.com katie@wagnerreg.com REGISTRANT /AGENT CONFERMED THEY DID NOT RECEDIS A DECISION LESTER REGARDENT

THE CONDITIONAL DATA.

From: Cheryl Wagner

Sent: Monday, September 11, 2017 8:00 PM
To: Kt Woodall ktwoodall@wagnerreg.com

Subject: Fwd: 83100-28. Agency letter for conditional data.

Pls respond to question below

Thx!!

Sent from my iPhone

Begin forwarded message:

From: "Walsh, Michael" < Walsh.Michael@epa.gov > Date: September 11, 2017 at 6:00:50 PM EDT
To: Cheryl Wagner < cheryl@wagnerreg.com>

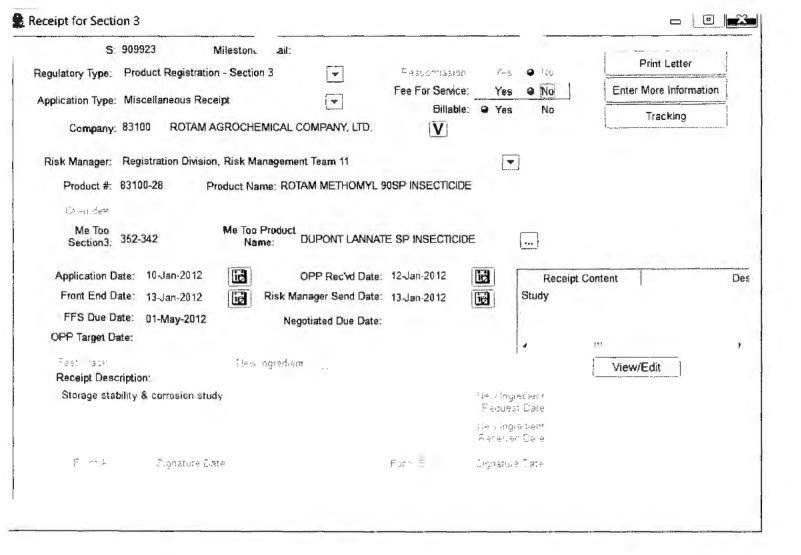
Subject: 83100-28. Agency letter for conditional data.

Dear Ms. Wagner:

Did you receive a letter from the Agency accepting the Storage Stability & Corrosion Characteristics conditional data for 83100-28? Please let me know.

Thank you.

Michael Walsh Product Manager 11 Invertebrate & Vertebrate Branch 2 Registration Division Office of Pesticide Programs U.S. EPA



SSICCIOTATECHAR DASA

PROCESSING REQUEST

Reg # 83100-28	Decision # D520389					
Description: Revised Basic CSF a	and Alternate CSFs 1					
Electronic Label & Letter On Von Electronic						
(see PPLS):	OR Label & Letter (Scanning required):					
□ Dated:	☐ Dated:					
Only one lab	el type should be selected					
Other Materials Sent (see jacket):					
New CSF(s) Dated: Augus	t 10, 2016					
Other:						
and clipped together, NOT STAPLED. materials to staff in the Information S jacket is full or only available as an in	erials in the jacket. It must be well organized Then give the jacket with the coversheet and Services Center (ISC) (Room S-4900). If a nage, please file materials in a new jacket and er information please call 703-605-0716.					
Reviewer: Gebken						
Division: RD						
Phone: 703-305-6701	Date: August 10, 2016					



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 22, 2016

Kt Woodall, Agent for Rotam Agrochemical Co. Ltd. Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Subject:

CSF Notification per PRN 98-10 -Revised Basic CSF and Alternate CSFs 1

Product Name: Rotam Methomyl 90SP Insecticide

EPA Registration Number: 83100-28 Application Date: August 10, 2016 Decision Number: D520389

Dear Kt Woodall:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

Basic CSF dated 8/10/2016

Alternate CSF 1 dated 8/10/2016 -

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Richard J. Gebken at 703-305-6701 or by email at gebken.richard@epa.gov.

Sincerely,

Richard Gebken Product Manager 10

Invertebrate & Vertebrate Branch 2

Office of Pesticide Programs

SEPA Envir	United States Onmental Protection (Washington, DC 20460		m Approv	Registrat Amendm Other			r Number
	Application for	Pesticide - S	ection	11			
1. Company/Product Number		2. EPA Product			3. Propose	d Class	sification
83100-28			rd Gebk				
Company/Product (Name)		PM#			-		
		FIVIE		None		Restricted	
Rotam Agrochemical Co. Ltd. /							
Rotam Methomyl 90SP Insecticide							
5. Name and Address of Applicant Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associa P.O. Box 640 Hockessin, DE 19707 Check if this		6. Expedited Ro (b)(l), my producto:					
	Sec	ction - II				,	
Yes* No	(s) if necessary. (For Section I oduction facility to the Basic & d EPA regulations at 40 CFR of this product. I understand and that if this notification is n A and I may be subject to enform the second of the subject to enform the second of the subject to enform	Agency le "Me Too" Other - Ex and Section II.) Alt. #1 CSF per F 152.46, and no o that it is a violatio ot consistent with i rement action and tion - III Vater Soluble Pack Yes X No "Yes" No ackage wgt co	etter dated Application Applic	on, ow. e 98-10. This anges have to U.S.C. Sec. as of PR Notices under section of X. On La.	s notification is been made to 1001 to willfu to 98-10 and tions 12 and 1 Container Metal Plastic Glass Paper Other (Specification	the lab ully mak 40 CFR 4 of FIF	eling or the te any false 152.46, this RA.
6. Manner in Which Label is Affixed	X Pap	ograph eer glued	-	Otheradhe	esive backed I	abel	
	Sec	tion - IV					
1. Contact Point (Complete items of			contacte	d, if necessar	ry, to process	ihis app	lication.)
Name	Title		Telep	hone No. (Inc	lude Area Co	le)	
I certify that the statements I have mad t acknowledge that any knowingly false both under applicable lay.	e or misleading statement may be	s thereto are true, acc	curate an	d complete.	woodall@wag 6. Date Appl Received (S		
2. Signature	Agent for R	3. Title Agent for Rotam Agrochemical Co. Ltd.					
4. Typed Name	5. Date						
Kt Woodall August 10th 2016							

August 10th, 2016

Document Processing Desk (NOTIF) ATTN: Richard Gebken, PM Team 10 Registration Division (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501



Wagner Regulatory Associates, Inc. P.O. Box 640 7217 Lancaster Pike, Suite A Hockessin, Delaware 19707

Dear Mr. Gebken;

Subject: Rotam Methomyl 90SP Insecticide, EPA Reg. No. 83100-28 - Notification

Wagner Regulatory Associates, Inc., as agent for Rotam Agrochemical Company Ltd., respectfully submits the enclosed CSF Notification to add an additional production facility to the Confidential Statement of Formulas. The revised Basic & Alternate #1 CSFs will replace all CSFs on file. In support of this notification, the following documents are enclosed:

- · Letter from Rotam Agrochemical Company Ltd. appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4) Basic & Alternate #1
- Formulators Exemption (8570-27)

If you have any questions about this submission please contact the undersigned at 302-635-7289 or ktwoodall@wagnerreg.com.

Respectfully submitted,

Kt Woodall

Rotam Agrochemical Company Ltd.,

Enclosures



United States

Environmental Protection Agency

Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address Rotam Agrochemical Company, Ltd.	EPA File Symbol/Registration Number 83100-28				
c/o Wagner Regulatory Associates, Inc. P.O. Box 640	Product Name Rotam Methomyl 90SP Insecticide				
Hockessin, DE 19707	Date of Confidential Statement of Formula (EPA Form 8570-4) 08/10/2016				

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Methomyl

EPA Form 8570-27 (Rev. 06-2004)

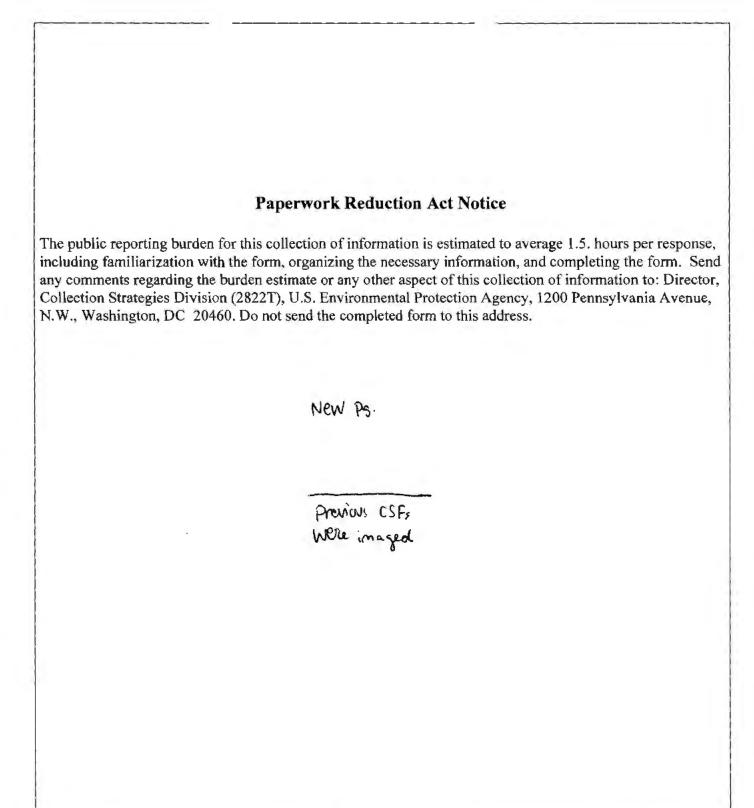
- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

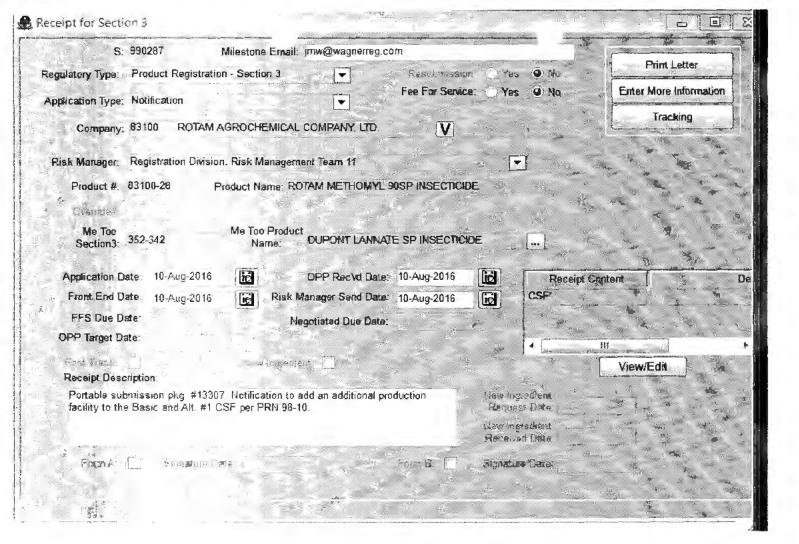
OR

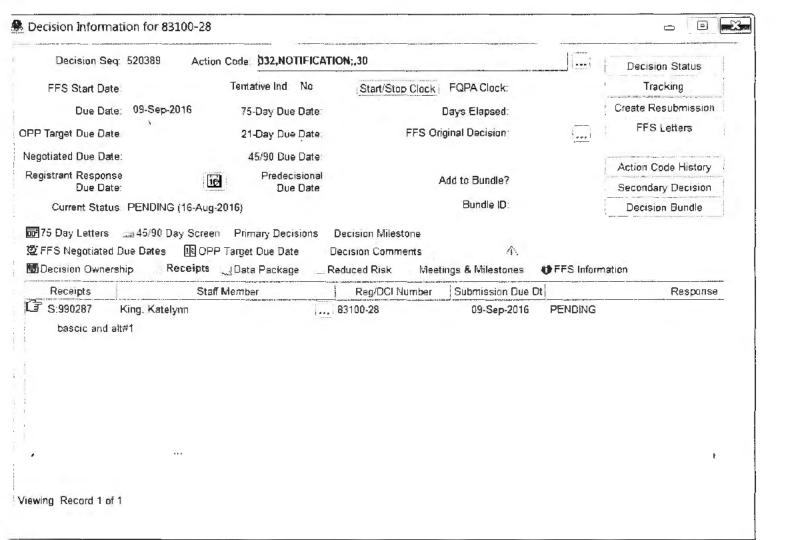
- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

	Source	
Active Ingredient Methomyl	Product Name	Registration Number
Signature XXII.	Name and Title Kt Woodall - Agent for Rotam Agrochemical Company	Date 08/10/2016

Copy 1 – EPA Copy 2 - Applicant copy







Talk to Camer about on CSF:

Walsh, Michael

From:

Walsh, Michael

Sent:

Tuesday, April 05, 2016 9:04 AM

To:

Gebken, Richard

Subject:

RE: PM REVIEW REQUESTED

Hi Richard.

Calle L 9/20/2016
Charle Woone @ 12:40 p. 1
to fix dishinitar lateral; is a
nue a coop.

Please check the label file for 83100-28 attached to the original message.

Thanks.

Mike

From: Gebken, Richard

Sent: Tuesday, April 05, 2016 8:12 AM

To: Walsh, Michael < Walsh. Michael@epa.gov>

Subject: RE: PM REVIEW REQUESTED

At first glance, this is a distributor product. Can't do much with a distributor product as far as approval.

From: Walsh, Michael

Sent: Friday, April 01, 2016 10:13 AM

To: Gebken, Richard < Gebken. Richard@epa.gov >

Subject: PM REVIEW REQUESTED

Hi Richard.

- This particular label revision is a result of an Agency Initiated Action to move the First Aid box to the Front Panel, since this is a Category I product.
- The registrant was asked to make additional changes based on the revisions to Chapter 10 of the Label Review Manual, so they updated the gloves statement.
- · Changes the bee language replacing "visiting" with "foraging".
- Nerija also mentioned that they added Water Soluble Packaging Language.

Below are the exchanges between Nerija and the company.

I have not reviewed the label or any of the attachments for this action. Please also note that it was a very new employee working on this submission.

Thank you for your offer to review and sign some of the pending overdue label amendments. Greatly appreciated.

Mike

From: Orentas, Nerija

Sent: Thursday, December 17, 2015 10:09 AM To: Walsh, Michael < Walsh. Michael @epa.gov>

Subject: PM REVIEW REQUESTED 83100-28 decision 509284 Agency Initiated Action First Aid Box

Hi Mike,

I realized that I had not asked for a PM Review again for this product. I conducted another electronic label review and made sure that your comments regarding PPE (adding >=14), replacing "visiting" with "foraging" in referring to bees, and other typographical errors. As I mentioned in the e-mail below, the registrant added additional label language for WSP.

Please let me know if you have any questions.

Thanks, Nerija

From: Orentas, Nerija

Sent: Wednesday, November 25, 2015 11:32 AM **To:** Walsh, Michael < Walsh. Michael@epa.gov>

Subject: FW: Methomyl 90 SP Label

Mike,

I know – a ton of attachments. This is the Agency Initiated action to move the First Aid box to the front that included a lot of back and forth regarding the water soluble packaging labeling text within the master label.

The .pdf and Word files (Word has highlighted changes) appear to include the WSP labeling. Please let me know if the additional WSP labeling is good (I checked the PRN and all of the required text is included: product name, statement of the active ingredients, signal word, skull and crossbones, "KOOROC", EPA Reg. number, Restricted Use Statement and a referral statement to the main label. For the "...Restricted Use Statement" the label contains the text "Restricted Use Pesticide". Is that sufficient?) and I will do another electronic label review to triple-check that there are no other changes.

Thanks, Nerija

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]
Sent: Wednesday, November 25, 2015 10:31 AM
To: Orentas, Nerija < Orentas.Nerija@epa.gov>

Subject: FW: Methomyl 90 SP Label

Hello,

Attached is a revised label incorporating the changes requested as well as pictures of the package labeling.

Please let me know if you need additional information.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Minerva Robles [mailto:minrobles@sbcqlobal.net]

Sent: Tuesday, November 24, 2015 8:25 PM

To: Cheryl Wagner; 'Garth Drury'; 'Tom Chavez'; 'Steve Slaveck'; 'Amporn Suriya Gueye'; 'Robert Ehn'

Cc: KT Woodall; James Wagner Subject: RE: Methomyl 90 SP Label

Hi Cheryl,

On pages 28-36 of the attached EPA word label, I have added a comment to each section that points you to the correct label component that makes up the commercial label for Nudrin SP. Please see the attached label components. I'm also attaching the photos that Robbie took at the warehouse in case EPA needs visuals.

Let me know if you need additional information from my end.

Best regards,

Minerva Robles R3 Ag Consulting, LLC 1629 Pollasky Ave., Suite 111 Clovis, CA 93612

(559) 297-9322 phone (559) 297-9341 fax minrobles@sbcglobal.net

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Friday, November 20, 2015 8:20 AM

To: 'Garth Drury' <gdrury@rotam.com>; 'Tom Chavez' <tomchavez@rotam.com>; Steve Slaveck < SteveSlaveck@rotam.com>; Amporn Suriya Gueye <amsuriya@rotam.com>; Minerva Robles <minrobles@sbcglobal.net>; Robert Ehn <<u>robertehn@sbcglobal.net</u>>; Minerva Robles <<u>minrobles@sbcglobal.net</u>>; 'Nicole Cecil' <nicolenance@sbcglobal.net>

Cc: KT Woodall ktwoodall@wagnerreg.com; James Wagner jmw@wagnerreg.com;

Subject: Methomyl 90 SP Label

Hello,

I've finally been able to learn more about the revisions that EPA is looking for on this master label.

Essentially, they want to know how each piece of this entire package is labeled, the composition of the packaging, and the exact wording on each component of the labeling.

Pages 1-27 are the Master Label—NO CHANGES NEED TO BE MADE WITH THIS SECTION.

Pages 28-36 are what are to be the other components of the label—box, pouches, etc.—The pages I've created have been modeled after Sinon's label (provided by EPA)—please review and edit pages 28-36 to reflect how Rotam's material is packaged and describe the composition of the packaging at the top of each page (see my examples highlighted in yellow)

I have no idea what prompted this request since the label was last reviewed in Feb. 2015—more than likely it's a matter of the luck of the draw in who you get as the reviewer at any given time. This particular reviewer wants to know

everything about how this product is labeled, the composition of each component of the label, and what verbiage is associated with each section of the components in addition to the master label.

Thanks for your help. Please return revised label to me ASAP for submission back to EPA.

Regards,

Cheryl Wagner
Wagner Regulatory Associates, Inc.
Telephone: (302) 635-7289

Fax: (302) 635-7295

Walsh, Michael

From:

McCall, Deborah

Sent:

Tuesday, February 23, 2016 4:27 PM

To:

Walsh, Michael

Subject:

FW: Methomyl 90 SP Label

Attachments:

83100-28-20151022.V4.pdf; EPA FPL Sub 14Sep2015 – 83100-28.pdf; ATT00001.txt; ATT00002.htm; 83100-28-20151022 V3_comments 11-24-15.docx; PVA BAG.pdf; PE

BAG.pdf; removed.txt; HAZMAT.pdf; IMAGE 1.jpg; Re: Methomyl 90 SP Amendment Pending

at EPA; 83100-28-20151022.V4.pdf

Mike

Where is this in the que?

Deborah McCall (Debbie)
Chief, Invertebrate & Vertebrate Branch 2
USEPA
Office of Pesticide Programs
1200 Pennsylvania Ave., NW (7505P)
Washington, DC 20460
703.605.0717
mccall.deborah @epa.gov

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Tuesday, February 23, 2016 11:25 AM

To: Gebken, Richard <Gebken.Richard@epa.gov>; McCall, Deborah <McCall.Deborah@epa.gov>

Cc: Orentas, Nerija < Orentas. Nerija@epa.gov>

Subject: FW: Methomyl 90 SP Label

Good morning,

WRA has made multiple inquiries regarding the status of a label that was amended at EPA's request back in Sept. 2015. Nerija Orentas requested additional information about the packaging of this label and requested label revisions, which Rotam Agrochemical Co. complied with and completed by November 2015. I have made multiple inquiries to Ms. Orentas and have not received any word back on when EPA expects to approve this label. The last correspondence I have from Ms. Orentas is below where she states that she forwarded the package to a project manager who is to review it. I've made additional inquiries since December 22, 2015, but to no avail.

Please advise when WRA and Rotam can expect EPA approval of this label.

Thank you.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Orentas, Nerija [mailto:Orentas.Nerija@epa.gov]

Sent: Tuesday, December 22, 2015 1:03 PM **To:** Cheryl Wagner < cheryl@wagnerreg.com>

Subject: RE: Methomyl 90 SP Label

Cheryl,

I forwarded your note to the Project Manager that conducts the final review. He was unable to complete the second-round review before the holidays. I will check in with him after the New Year.

Nerija Orentas Biologist, Invertebrate & Vertebrate Branch 2 Registration Division Office of Pesticide Programs U.S. EPA 703-347-0509 Orentas.Nerija@epa.gov

From: Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Tuesday, December 22, 2015 1:00 PM **To:** Orentas, Nerija < Orentas. Nerija@epa.gov>

Subject: FW: Methomyl 90 SP Label

We await an update on the status of the Rotam Methomyl 90 SP (Nudrin) label as requested below.

Please advise.

Regards,

Cheryl Wagner
Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Cheryl Wagner

Sent: Thursday, December 17, 2015 9:01 AM

To: 'Orentas, Nerija'

Subject: RE: Methomyl 90 SP Label

Please advise on the status of this label update.

Thank you.

Regards,

Cheryl Wagner

Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289

Fax: (302) 635-7295

From: Cheryl Wagner

Sent: Wednesday, November 25, 2015 10:31 AM

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Sent: Tuesday, November 24, 2015 8:25 PM

To: Cheryl Wagner; 'Garth Drury'; 'Tom Chavez'; 'Steve Slaveck'; 'Amporn Suriya Gueye'; 'Robert Ehn'

Cc: KT Woodall; James Wagner **Subject:** RE: Methomyl 90 SP Label

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Minerva Robles
R3 Ag Consulting, LLC
1629 Pollasky Ave., Suite 111
Clovis, CA 93612

(559) 297-9322 phone (559) 297-9341 fax minrobles@sbcglobal.net **From:** Cheryl Wagner [mailto:cheryl@wagnerreg.com]

Sent: Friday, November 20, 2015 8:20 AM

To: 'Garth Drury' <<u>gdrury@rotam.com</u>>; 'Tom Chavez' <<u>tomchavez@rotam.com</u>>; Steve Slaveck <SteveSlaveck@rotam.com>; Amporn Suriya Gueye <amsuriya@rotam.com>; Minerva Robles

<minrobles@sbcglobal.net>; Robert Ehn <robertehn@sbcglobal.net>; Minerva Robles <minrobles@sbcglobal.net>;

'Nicole Cecil' <nicolenance@sbcglobal.net>

Cc: KT Woodall ktwoodall@wagnerreg.com; James Wagner jmw@wagnerreg.com>

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Regards,

Cheryl Wagner
Wagner Regulatory Associates, Inc.

Telephone: (302) 635-7289 Fax: (302) 635-7295



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 21, 2015

Ms. Cheryl Wagner, Agent Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Subject: Agency Initiated Action - First Aid Statements Required on Front Panel of Label

Product Name: Rotam Methomyl 90SP Insecticide

EPA Registration Number: 83100-28

Decision Number: 509284

Dear Ms. Wagner:

Upon review of the product record, the Agency has determined that the following change must be made to the product label:

• Per 40 CFR Part 156.60(a) and 156.68(d), the First Aid box must appear on the front panel of the product label for Category I products, as is seen on 83100-27.

Please submit a revised label within 10 days of the date of this letter. If you have any questions, please contact me by phone at (703) 308-2972, or via email at walsh.michael@epa.gov.

Sincerely,

Michael Walsh

Product Manager 11

Invertebrate & Vertebrate Branch 2 Registration Division (7505P)

Office of Pesticide Programs

Walsh, Michael

From:

Walsh, Michael

Sent: Friday, September 18, 2015 3:23 PM

To: Petrella, Carlyn

Subject: 83100-28. Agency Action for Cat I First Aid Box on Front Panel.

Attachments: image2015-09-18-150616.pdf; 82557-2 Agency Action 20150821.docx

Hi Carlyn.

Please draft an Agency-Initiated Action letter to correct the label for 83100-28. In reviewing Final Printed Labels, I noticed that Rotam had one label correct (83100-27) and one very wrong label (83100-28).

Both products are Category I for Acute Tox, but only one of the products has the First Aid box on the Front Panel, which is where it belongs for Poison products.

Attached please find page 1 of the labels and a template for you to use in drafting an Agency-Initiated Action letter to correct the label for 83100-28 by moving the First Aid box to the Front Panel of the label (as seen in 83100-27).

Let's plan to enter this action in OPPIN as an Agency-Initiated Action with a 10-Day turn around. If they need more time to provide a corrected label, we can discuss it with them. For now, we need to ask for a response in 10-Days. This will give us a Decision Number to include in the header block of the letter.

- · Get the jacket from the File Room
- Confirm in PPLS that the First Aid box is on page 2
- Draft the letter to:

Cheryl Wagner, Agent Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707

Email: Cheryl Wagner <cheryl@wagnerreg.com>

Please let me know if you have any questions.

Thanks.

Mike

CARLYN- 9/18/15
PLUAGE STEE
EMATEL
THONKS
83100-28 - MILES

Can UN-

Aconcy ACTION REQUIRE

RESTRICTED USE PESTICIDE DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP 1A INSECTICIDE

NUDRINSP)

INSECTICIDE In Water Soluble Packets

Active Ingredient

Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)

Other Ingredients

10%

DANGER POISON PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Manufactured for: ROTAM NORTH AMERICA, INC. 4900 Koger Blvd., Suite #140 Greensboro, NC 27407 1-866-927-6826

PRODUCT OF TAIWAN

ROTAM

Net Contents: 2 Jb EPA Reg. No.: 83100-28-83979*

EPA Est. No.: 88159-TWN-001

See inside label booklet for First Aid, additional Precautionary Statements, and Directions for Use.

NUDSP-01-A021915-REVB042915-2LB

1981 Nudrin SP 2lb DFU.indd 1

83100-28

4/29/15 5:18 PM

CATI - WHERE IS THE FIRST 7

RESTRICTED USE PESTICIDE

DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

Water Soluble Liquid

Active Ingredient Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate.

Other Ingredients

Contains Methanol

Contains 2.4 lbs. active ingredient per gallor

KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

EXAMPLE

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID

(N-Methyl Carbamate Insecticide)

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to freesh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible, Call a poison control center or doctor for further treatment advice.

EXECUTE: A poison control center or doctor for further treatment advice. Have person sin a class of water if able to smallow. Do not

possible. Call a poison control center or occur for further treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vorniting unless told to by a poison control center or doctor. Do not give anything to an unconscious person,

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center

or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE — SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention with anticholinesterase activity which may include weakness, biurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors, if poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

Net Contents: 55 GALLONS (208.19 liters)

TREATMENT — Atropine sulfate should be used for treatment, Administer repeated doses, 1.2 to 2.0 mg, intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to

atropinization is achieved, Maintain atropinization until the patient recovers. Artificial respiration of oxygen may be necessary, Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to NUDRIN LV INSECTICIDE alone. However, for exposure to combinations of NUDRIN LV INSECTICIDE and organophosphorous insectioides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Poison Control center 24-hr Emergency Hotline at: 1-800-222-1222.

Manufactured for ROTAM NORTH AMERICA, INC. 4900 Koger Blvd., Suite #140, Greenaboro, NC 27407, 1-866-927-6826

See inside booklet for additional Precautionary Statements and Directions for USE.

EPA Reg. No.: 83100-27-83979 EPA Est. No.: 5905-GA-01

Non-refillable Plastic Container

NUDLV-01-A021915-REVC072215-55G

83100-27

NOT REVIEWED In Accordance with PR Notice 8-2 Based on Draft Labeling Dated 2/19/15

read instructions on reverse before	completing form)		Form Ang					expires 05-31-98
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Environmental Protection Agency				- 1	1	Amendn	nent		
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Rotam Agrochemical Co. Ltd. c/o Wagner Regulatory Associate:	s. Inc.		to:						
P.O. Box 640	-,			, d					
Hockessin, DE 19707			y.						
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Amendment - Explain below.		Se	ection /- II	l nal printed lab	ole in	response			
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Resubmission in response to Age	ency letter dated	- 4	_ /LJ	le Too" Applic					
Notification - Explain below.				her - Explain	below	V.			
Explanation: Use additional page(s)	if necessary. (For Section	Tand Section	ı II.)					
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* Certification must Unit Pa	1	.	Package wgt	containe	r		Paper		
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1. Contact Point (Complete items dire		dentification	of individual	to be contac	cted,				
Name Cheryl Wagner	Title	Agent for F	Rotam Limited	d		(302) 63		Include Area	Code
	Certific			······································			6. Dat	e Application	
I certify that the statements I have made of							Red	eived	
I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. (Stamped)						d)			
2. Signature		3. Title					,		
co o e Dona		Agent for I	Rotam Agroch	nemical Co.	Ltd.				
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4. Typed Name		5. Date							
Cheryl Wagner			r 14 th 2015						
Cheryl Wagner September 14 th , 2015									

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Rotam Agrochemical Co. Ltd.	/Rotam Methomyl 90	SP						Restricted
Insecticide	·		İ					
5. Name and Address of App	licant (/nc/ude Zip Cod	le)					IFRA Section	
Rotam Agrochemical Co. L	td		(b)(l), my pro to:	oduct is sin	nilar or identic	alin con	position and l	labeling
c/o Wagner Regulatory As			10.				- R Notice 8-2	
P.O. Box 640 Hockessin, DE 19707							z ng Dated	- • • •
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		Se	ection - II					
Amendment - Explain be	low.			printed labe	els in response		/ 19 th , 2015	
Resubmission in respons	se to Agency letter dated			Too" Applica		rebluary	/ 1 9 **, 2015	
Notification - Explain belo	ow.		Other	Explain be	elow.			
Explanation: Use additional	page(s) if necessary.	(For Section	ı I and Section II.	.)				
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		Se	ection - III					
 Material This Product Will Child-Resistant Packaging 	Unit Packaged In:	———	Water Soluble P	Packaging	2. Type of	Contain		
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	If "Yes"	No. per	If "Yes"	No. per		Glass		
* Certification must	Unit Packaging wgt.	container	Package wgt	container		Paper		
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Contact Point (Complete its		<u>identificatior</u>	n of individual to i	be contact			ocess this app Include Area	
Name Title Telephone Cheryl Wagner Agent for Rotam Limited (302) 635-								
Loortify that the statements I have	Certific		ats thereto are true	accurate a	nd complete		e Application	
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or								
both under applicable law. 2. Signature		3. Title					(Stamped	1)
		Agent for Rotam Agrochemical Co. Ltd.						
Charge & Wagn]							
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Onorgi Tragnol	nber 14 th , 2015							

Wagner Regulatory Associates, Inc.

7217 Lancaster Pike, Suite A

Hockessin, Delaware 19707

P.O. Box 640

Document Processing Desk ATTN: Richard Gebken, PM Team 10 Registration Division (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501

PHI

Dear Mr. Gebken,

Final Print Labels - Distributor only Subject:

Wagner Regulatory Associates, Inc., as agent for Rotam Agrochemical Co. Ltd. respectfully submits the enclosed final print labels for the following products -

- 83100-27 Rotam Methomyl 29LV Insecticide as requested in the EPA letter dated February 19th, 2015
- 83100-28 Rotam Methomyl 90SP Insecticide as requested in the EPA letter dated February 19th, 2015

These products are only being marketed under the supplemental distributor labels and are not being packaged and/or distributed under the Rotam Agrochemical Co. Ltd. EPA registration numbers.

If you have any questions about this submission please contact the undersigned at 302-635-7289 or cheryl@wagnerreg.com.

Regards.

Cheryl Wagner

Agent for Rotam Agrochemical Co. Ltd.

Charle & Wagne

Enclosures



March 10, 2014

U.S. Environmental Protection Agency Office of Pesticide Programs (7505P) One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

Re: Designation of Agent

Dear Sir or Madam:

This letter serves as notification that ROTAM AGROCHEMICAL COMPANY LIMITED (Firm Number: 83100) has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as its Agent regarding all pesticide registration matters the company may have with the U.S. Environmental Protection Agency (EPA).

ROTAM AGROCHEMICAL COMPANY LIMITED hereby authorizes EPA to contact any of the following individuals within WRA, Inc. on behalf of the company:

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Managing Director
Wagner Regulatory Associates, Inc.
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Hockessin, DE 19707
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Authorization to contact these staff members within WRA, Inc remains in effect until such time that ROTAM AGROCHEMICAL COMPANY LIMITED provides notification in writing of any changes.

Respectfully submitted,



Yifan Wu Senior Vice President Technical Development Department Tel: 86-512-5790 3076 Fax: 86-512-5771 8692 Email: yifanwu@rotam.com

cc: WRA, Inc.

RESTRICTED USE PESTICIDE DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

INSECTICIDE

CIDE In Water Soluble Packets

Active Ingredient Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)......90% Other Ingredients 10%
TOTAL 100%

KEEP OUT OF REACH OF CHILDREN POISON

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Net Contents: 2 lb

EPA Reg. No.: 83100-28-83979

Manufactured for: ROTAM NORTH AMERICA, INC. 4900 Koger Blvd., Suite #140 Greensboro, NC 27407 1-866-927-6826

EPA Est. No.: 88159-TWN-001 PRODUCT OF TAIWAN



See inside label booklet for First Aid, additional Precautionary Statements, and Directions for Use.

NUDSP-01-A021915-REVB042915-2LB

NOT REVIEWED

In Accordance with PR Notice 8-2

Based on Draft Labeling Dated

4/29/15 5:18 PN

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FIRST AID

(CONTAINS AN N-Methyl Carbamate Insecticide THAT INHIBITS CHOLINESTERASE)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE -- SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention. **POISONING SYMPTOMS** — Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to NUDRIN SP INSECTICIDE alone. However, for exposure to combinations of NUDRIN SP INSECTICIDE and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment. Do not use morphine. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-223-1222.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- · Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or butyl rubber
- Socks and chemical resistant footwear
- Protective eyewear
- · Chemical resistant apron
- Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.
- Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean highwater mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include peorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

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DIRECTIONS FOR USE

Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all ≥14 mils
- · Shoes plus socks
- · Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Do not formulate this product into other end-use products without written permission from Rotam.

Do not apply thru drip chemigation unless accompanied by Rotam supplemental labeling.

NUDRIN SP INSECTICIDE should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

NUCRIN SP INSECTICIDE is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application. Hand-held equipment is prohibited for application to crops.

Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own" or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

RESISTANCE MANAGEMENT

For resistance management, NUDRIN SP INSECTICIDE is a group 1A insecticide. Repeated and exclusive use of NUDRIN SP INSECTICIDE or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of mode-of-action classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at http://www.irac-onlire.org.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

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SCOUTING

Monitor insect populations to determine whether or not there is a need for application of NUDRIN SP INSECTICIDE based on locally determined economic thresholds. More than one treatment of NUDRIN SP INSECTICIDE may be required to control a population of pests.

BENEFICIAL ARTHROPODS

NUDRIN SP INSECTICIDE at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including big-eyed bugs, damsel bugs, flower bugs and spiders in cotton and soybeans. While these beneficials cannot be relied upon to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying NUDRIN SP INSECTICIDE.

Fill spray tank 1/4 to 1/2 full of water. Add NUDRIN SP INSECTICIDE directly to spray tank. Carefully open the outer barrier bag containing NUDRIN SP INSECTICIDE in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use NUDRIN SP INSECTICIDE with Bordeaux mixture (copper sulfate and hydrated lime), "Du Ter" (triphenyltin hydroxide), lime sulfur, "Rayplex" iron nor in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of NUDRIN SP INSECTICIDE water soluble packets first

- Be sure the soluble packets are completely dissolved

- Introduce Boron containing solutions last

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute NUDRIN SP INSECTICIDE formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

- 1. NUDRIN SP INSECTICIDE and other products in water soluble bags
- 2. Vvater dispersible granules
- 3. Wettable powders
- 4. Water based suspension concentrates
- 5. Water soluble concentrates

Follow local practice and manufacturer's recommendation.

- 6. Oil based suspension concentrates
- 7. Emulsifiable concentrates
- 8. Adjuvants, surfactants, oils
- Soluble fertilizers
- 10. Drift retardants

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APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of NUDRIN SP INSECTICIDE should be applied, as needed, to keep pest populations within threshold limits. On most crops, NUDRIN SP INSECTICIDE should be applied at 5 to 7 day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since NUDRIN SP INSECTICIDE is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals, per acre (gpa) except 10 gpa for peaches and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays, and
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa Celerv Peas (succulent) Anise Collards Peppermint Asparagus **Peppers** Corn Potato Beans Cotton Broccoli Soybean Cucumber Spinach Brussels sprouts Lettuce Sugar beet Cabbage Melons Carrot Mint Summer Squash Peanuts Cauliflower Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take all necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of NUDRIN SP INSECTICIDE on Alfalfa, Green and Dry Bulb Onions, Potatoes, Sugar Beets and Wheat Using Overhead Sprinkler Chemigation

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, onions, potatoes, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of NUDRIN SP INSECTICIDE as high as possible in the application. Apply NUDRIN SP INSECTICIDE in 0.1 to 0.2 inches of water per acre. NUDRIN SP INSECTICIDE is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of NUDRIN SP INSECTICIDE should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

NUDRIN SP INSECTICIDE may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible build up of material on 100 mesh or smaller screens. Do not apply NUDRIN SP INSECTICIDE through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation: Preparation

A pesticide tank is recommended for the application of NUDRIN SP INSECTICIDE in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of NUDRIN SP INSECTICIDE into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of NUDRIN SP INSECTICIDE. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7).

Injection Into Chemigation Systems

Inject the proper amount of the NUDRIN SP INSECTICIDE solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing NUDRIN SP INSECTICIDE into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing NUDRIN SP INSECTICIDE to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of NUDRIN SP INSECTICIDE must provide for uniform distribution of NUDRIN SP INSECTICIDE treated water. Non-uniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying NUDRIN SP INSECTICIDE. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when NUDR!N SP INSECTICIDE is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

- 1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
- 2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- 3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- 4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- 6. Systems must use a metering pump such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- 7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction.

There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain

legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER".

Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply NUDRIN SP INSECTICIDE in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard cleanout procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

- 1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
- 2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aeriai Lyift Reduction Advisory Information.

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See **Wind, Temperature and Humidity, and Temperature Inversions** sections of this label.

Controlling Droplet Size - General Techniques

- **Volume** Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.
- **Nozzle Type** Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size - Aircraft

- **Number of Nozzles** Use the minimum number of nozzles with the highest flow rate that provide uniform coverage.
- Nozzle Orientation Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- • **Boom Length** For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- Application Height Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- **3wath Adjustment** When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges of the fields, the applicator must compensate for a this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. AVOID GUSTY OR WINDLESS CONDITIONS. **Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

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AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift.

Adjust deflectors and aiming devices so that spray is only directed into the canopy.

Block off upward pointed nozzles when there is no overhanging canopy.

Use only enough air volume to penetrate the canopy and provide good coverage.

Do not allow spray to go beyond the edge of the cultivated area. Spray the outside row only from outside the planting.

CROP AND RATE TABLES

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 – 1	7*	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		
·	Do not apply to dormant or semi-dor is 50° F, or lower. Do not apply more than 4 pounds of per crop. Do not make more than 10 application Chemigation: NUDRIN SP INSECTION SPINSECTION SPINSECTION SPINSECTION SPINSECTION SPINSECTION SPINSECTION SPINSECTION SECTION FOR MORE TOO NOT Apply within 7 days of cutting the section for more than 100 more than 1	NUDRIN SP INSE ons per crop. CIDE may be appli ts, use the highest 0.1 to 0.2 inches e information.	ECTICIDE per acre led by overhead t listed rate of of water per acre.	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Anise (Fennel)	Cabbage Looper	1	7	48 hrs
	Beet Armyworm	1/2 - 1		
	Do not apply more than 5 pounds of per crop. Do not make more than 10 application		ECTICIDE per acre	
Apple (Ground application only)	Apple Aphid Rosy Apple Aphid Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug	1/2 - 1 *	14	72 hrs
	Codling Moth (10-12 day spray intervals)	7		
·	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1*		
Do not use on Early Macintosh & Wealthy varieties. Do not apply more than 5 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. * Apply in a minimum of 50 gallons of water per acre.		·		

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	To Harvoct	REI
Asparagus	Beet Armyworm Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs
i	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of per crop. Do not make more than 8 application		ECTICIDE per acre	
Avocado	Western Avocado Leafroller Omnivorous Looper	1/2 - 1	1	48 hrs
	Do not apply more than 1 pound of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Beans (Succulent)	Leafhopper Mexican Bean Beetle	1/4 – 1	Succulent Beans 1/4 – 1/2 lb 1,	48 hrs
Including:	Fall Armyworm Variegated Cutworm	1/2	over 1/2 lb 3;	
Kidney Lima Mung Navy Pinto Snap Wax Broad Fava Asparagus Blackeyed peas Cowpeas Chick peas Garbanzo	Beet Armyworm Corn Earworm Saltmarsh Caterpillar Yellowstriped Armyworm Western Yellowstriped Armyworm Lygus Bugs Thrips Aphids Loopers* European Corn Borer (Ovicide & Larvicide) Initiate when moth flights first appear and continue preventive treatments at 3-4 day intervals to control eggs and larvae.	1/2 - 1	3 - Vines 7 - Hay	
beans Sweet lupine	Spotted Cucumber Beetle	1/4 – 1/2		
White sweet lupine White lupine Grain lupine	Succulent Beans - Do not apply more than 5 pounds of per crop. Do not make more than 10 applications are the company to the co	ons per crop.	ECTICIDE per acre	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Beans (Dry) (Same as Beans, Succulent)	(Same as Beans, Succulent)	(Same as Beans, Succulent)	14 - Dry Beans * 14 - Vines * 14 - Hay *	48 hrs
	Do not apply more than 5 pounds of per crop. Do not make more than 10 application Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.	ons per crop.	ECTICIDE per acre	
Beets (Table)	Imported Cabbageworm	1/4 - 1	0 - roots 10 -tops	48 hrs
	Beet Armyworm Cabbage Looper Diamondback Moth	1/2 - 1	10 1000	
	Cucumber Beetle Variegated Cutworm	1/2		
	Do not apply more than 4 pounds of per crop. Do not make more than 8 application		CTICIDE per acre	
Bermudagrass pasture	Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1	7 - Forage * 3 - Dehydrated Hay **	48 hrs
	Do not apply more than 1 pound of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop. * Do not apply within 7 days of feeding forage or allowing livestock to graze. ** Do not apply within 3 days of cutting for hay.			

Blueberries	Blueberry Leafhopper Aphids	4.00		
	Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2	3	48 hrs
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1		
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		· ·
	Blueberry Maggot	1/4 - 1/2		
	Do not apply more than 4 pounds of per crop. Do not make more than 4 application * For ground use only.		CTICIDE per acre	
Broccoli	Loopers Diamondback Moth	1/2 - 1**	3	48 hrs
Ĺ	Imported Cabbageworm	1/4 - 1**		
	Do not apply more than 7 pounds of per crop. Do not make more than 10 application between treatments is 2 days. ** Add a wetting agent to improve co	ons per crop; minir	,	
Erussels	Loopers Imported Cabbageworm Diamondback Moth	1/2 – 1 **	3	48 hrs
Sµrouts	Variegated Cutworm	1/2 **		
	Do not apply more than 6 pounds of per crop. Do not make more than 10 application treatments is 2 days. ** Add a wetting agent to improve co	ons per crop; minir	,	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Cabbage	Loopers * Diamondback Moth Fall Armyworm	1/2 - 1 **	1	48 hrs
	Imported Cabbageworm	1/4 - 1 **		
	Variegated Cutworm	1/2 **		•
	Do not apply more than 8 pounds of per crop. Do not make more than 15 application between treatments is 2 days. * Do not use for Loopers in AL & GA ** Add a wetting agent to improve co	ons per crop; minir	·	
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	48 hrs
	Variegated Cutworm	1/4 – 1/2		
	Do not apply more than 7 pounds of per crop. Do not make more than 10 application		CTICIDE per acre	
	Imported Cabbageworm	1/4 – 1 **	. 3	48 hrs
	Loopers Diamondback Moth	1/2 1 **		
Cauliflower	Variegated Cutworm	1/2 **		
	Do not apply more than 8 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. ** Add a wetting agent to improve coverage.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Celery	Beet Armyworm Aster Leafhopper	1/2 – 1		48 hrs
	Loopers	1	7	
	Variegated Cutworm	1/2		
	Armyworms	1/4 - 1		
	Do not apply more than 7 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop.			
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 -1	80	48 hrs
	Do not apply more than 2 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	48 hrs
	Do not apply more than 8 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop. * Minimum of 25 gallons water per acre by ground or 5 gallons by air.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2	10	48 hrs
Grilly	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1	·	
	Do not apply when temperature is le Do not apply when crop is less than Do not apply more than 6 pounds of per crop. Do not make more than 8 application * Do not use for Loopers in AL & GA	10" tall NUDRIN SP INSE ns per crop.	CTICIDE per acre	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	To Harvoct	REI
Corn (Field, Popcorn & Seed)	Earworm – (Ovicide/Larvicide) Armyworm Fall Armyworm European Corn Borer Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 – 1/2	21 - Ears 3 - Forage* 21 - Stover*	48 hrs
	Variegated Cutworm Beet Armyworm	1/2		
	Do not apply more than 2.5 pounds of per crop. Do not make more than 5 application *Corn forage is green actively growin ears intact, then plants can be fed di silage. Corn stover are the parts of the grain at full plant maturity. These fed as roughage to animals. Timing of applications: Do not make prior to tassel push. Make 1 application control of early season pests; make adays later.	ns per crop. In plants that are herectly to animals on the plant that remains remaining stalks are than two aption when corn is a	narvested with the or used to make in after removal of and leaves can be oplications to corn at 1-2 leaf stage for	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Corn (Sweet)	EarwormWhorl as needed	1/3 – 1/2	0 - Ears	48 hrs
	Fall Armyworm Armyworm Earworm, (Ovicide/Larvicide) European Corn Borer -Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 – 1/2	3 - Forage 21 - Stover	
	Variegated Cutworm Beet Armyworm	1/2		
	Certain hybrid varieties of sweet corr Treat a small area to determine crop Do not apply more than 7 pounds of per crop. Do not make more than 28 application between treatments is 1 day. Timing of applications: Do not make prior to tassel push. Make 1 application control of early season pests; ma 5-7 days later.	safety before full a NUDRIN SP INSE ons per crop; minir more than two ap tion when corn is a	scale spraying. CTICIDE per acre num interval plications to corn at 1-2 leaf stage	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Cotton – All U.S.	Ovicide/Larvicide - Bollworm Tobacco Budworm (Initiate schedule when significant numbers of eggs are present. Continue at 3 to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.) Lygus Bugs/Plant Bugs (adults and nymphs) Start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs
	Cotton Leafworm	1/4 – 1/2		
	Cotton Fleahopper (as needed)	1/8 – 1/4		
	Aphids Thrips	1/4		

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Cotton (continued) East of Rockies only	(Early Season) Bollworm Tobacco Budworm Beet Armyworm Cotton Leafperforator Fall Armyworm Lygus Bugs/PlantBugs (adults and nymphs) Use as occasional spray in regular schedule but not more often than every 10 days.	worm orm erforator m PlantBugs d nymphs) onal spray in regular not more often than	72	
	(Late Season) Bollworm Tobacco Budworm Beet Armyworm Cotton Leafperforator Fall Armyworm Lygus Bugs/Plant Bugs (adult and nymphs) Up to 3 applications at 3-5 day intervals after desired boll load set on plants.	1/2 – 3/4		
Texas	Cotton Aphid	1/4-2/3		
West of Rockies only	Larvicide for worms: Bollworm Fall Armyworm Tobacco Budworm Lygus Bugs Beet Armyworm	1/2-3/4		
	Cotton Leafperforator	1/3-3/4		
	For applications West of the Rockies, make applications on 3-5 day intervals after desired boll load set on plants. For all cotton applications: Do not apply more than 2 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop. Use may redden cotton. If excessive, stop or alternate with other insecticides. Do not graze or feed.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm	1/2 - 1	1/2 lb 1 Over 1/2 lb 3	48 hrs
	Variegated Cutworm	1/2		·
	Do not apply more than 6 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 12 applications per crop.			
Eggplant	Green Peach Aphid	1/4 – 1	5	48 hrs
	Tomato Pinworm (Ground Application Only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop.			
	Beet Armyworm	1/2 - 1	10	48 hrs
Endive, Escarole	Do not apply more than 5 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Garlic	Beet Armyworm	1/2**	7	48 hrs
	Do not apply more than 3 pounds of per crop. Do not make more than 6 application ** Add a wetting agent to improve co	ns per crop.	ECTICIDE per acre	
Grapefruit CA, AZ & HI only	Thrips Fruittree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			
Horseradish (Ground	Aphids Thrips	1/2	65	48 hrs
application Only)	Do not apply more than 2 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			
Leafy Green Vegetables: Beet (tops), Dandelions,	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	48 hrs
Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Do not apply more than 4 pounds of per crop. Do not make more than 8 application * Do not use for Cabbage Loopers in	ns per crop.	ECTICIDE per acre	n ort

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	To Harvoct	REI
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of per crop. Do not make more than 4 application		ECTICIDE per acre	
Lentils	Western Yellowstriped Armyworm	1/2 - 1	21	48 hrs
	Do not apply more than 1 pound of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			
Lettuce	Alfalfa Looper	1/4 - 1	1/4-1/2 lb 7	48 hrs
(Head and Leaf varieties)	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1	over 1/2 lb 10	
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 6.3 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 12 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 2 days.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Melons Including: Canteloupe Casaba Santa Claus melon Crenshaw melon Honeydew melon Honey balls Persian melon	Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Cucumber Beetles Melon Aphid Melonworm eydew elon ey balls Sian melon Variegated Cutworm Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Fall Armyworm Variegated Cutworm 1/2	48 hrs		
Golden Pershaw melon Mango melon Pineapple melon Snake melon Watermelon	Variegated Cutworm Do not apply more than 6 pounds of per crop. Do not make more than 12 application	NUDRIN SP INSE	CTICIDE per acre	
Mint (Peppermint,	Variegated Cutworm Alfalfa Looper	1	14	48 hrs
Spearmint)	Flea Beetles	3/4 -1		
	Do not apply more than 2 pounds of per crop. Do not make more than 4 application		CTICIDE per acre	
Nectarine	Thrips	1/2 – 1	1	72 nrs
CA & AZ only Do not apply more than 3 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 3 applications per crop.				* · · · ·

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Onions	Beet Armyworm	1/2 - 1**	7 - Green &	48 hrs
(Green & Dry Bulb)	Thrips* Variegated Cutworm Black Cutworm	1**	Dry Bulb Onions	
	Onions, green Do not apply more than 6 pounds of per crop. Do not make more than 8 application between treatments is 5 days. Onions, dry bulb Do not apply more than 4 pounds of per crop. Do not make more than 8 application interval between treatments is 5 days. *Chemigation: NUDRIN SP INSECTION.	ns per crop; minim NUDRIN SP INSE ns per crop; minim s.	um interval CTICIDE per acre um treatment	
	sprinkler chemigation to control thrips populations reach 3-5 thrips per plan agent. Apply in 0.1 to 0.2 inches of w section for more information. ** Add a wetting agent to improve co	s. Begin application t. For best results vater per acre. See	ns before thrip add a wetting	
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruittree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs
e e e e e e e e e e e e e e e e e e e	Do not apply more than 3 pounds of per crop. Do not make more than 4 application		CTICIDE per acre	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	I A Harvact	REI
Peaches	Catfacing Insects (Plant Bugs and Stink Bugs) - Begin at petal fall and continue in cover sprays at 7 to 10-day intervals. Oriental Fruit Moth* - Begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid Do not apply more than 6 pounds of per crop. Do not make more than 6 application * Oriental Fruit Moth (Ground Applica)	ns per crop.		4 days

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	To Harvoct	REI
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm	1/4 – 1	21	48 hrs
	Beet Armyworm	3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper ** Thrips Granulate Cutworm	1/2 – 1		
·	per crop. Do not make more than 8 application * NUDRIN SP INSECTICIDE has ovi earworm. **Soybean Looper is difficult to contr Do not apply to worms greater than	NO not make more than 8 applications per crop. NUDRIN SP INSECTICIDE has ovicidal and larvicidal control on corn arworm. *Soybean Looper is difficult to control. NO not apply to worms greater than 1/2" long. Is higher rate for severe infestations.		
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1*	7	48 hrs
	Do not apply more than 2 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop. * Apply in a minimum of 50 gallons of water per acre.			

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Peas (succulent) Including: Pigeon peas Chick peas Garbanzo beans	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 – Forage 14 - Hay	48 hrs
Dwarf peas Garden peas Green peas	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		
English Peas Field peas Edible pod peas Do not apply more than 3 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. * Do not use for Cabbage Loopers in AL & GA.		·		
Pecans	Aphids	1/2 - 1	30	48
Southeast only	Do not apply more than 7 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 7 applications per crop.			hrs
Peppers Including: Bell Hot Pimentos	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 – 1	3	48 hrs
Sweet	Variegated Cutworm	1/4 – 1/2		
:	European Corn Borer	1		
	Do not apply more than 3.6 pounds of acre per crop. Do not make more than 8 application		SECTICIDE per	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Pomegranates	Omnivorous Leafroller	. 1	14	48 hrs
	Do not apply more than 2 pounds of per crop. Do not make more than 2 application		CTICIDE per acre	1115
Potato	Tuberworm* Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 – 1	6	48 hrs
	Variegated Cutworm Flea Beetles	1/2		
	Do not apply more than 5 pounds of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop. Chemigation: NUDRIN SP INSECTICIDE may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of NUDRIN SP INSECTICIDE. Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section.			
	*Repeat applications of NUDRIN SP schedule, or longer as needed, to co application schedule of effective inse action may be needed to keep foliar possible prior to harvest to reduce th Failure to adequately control tuberwoor vine kill increases the risk of tuber	ntrol tuber worm p ecticides with differ feeding larval pop e risk of larval dar orm larvae prior to	opulations. An ent modes of ulations as low as nage to the tubers.	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Sorghum	Sorghum Webworm	1/2*	14**	48
Including: Sudangrass (except Sweet Sorghum)	Sorghum MidgeApply when 50% bloom and 3-5 days later if needed. Fall Armyworm (Budworm) Beet Armyworm Corn Earworm Armyworm	1/4 – 1/2*		hrs
Do not apply more than 1 pound of NUDRIN SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop. * Minimum of 10 gallons per acre by ground or 2 gallons per acre by air. ** Do not apply within 14 days of feeding forage or cutting for hay.				

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Soybeans	Green Cloverworm Velvetbean Caterpillar Mexican Bean Beetle Corn Earworm - Light to moderate Infestations	1/8 - 1/4 (see Insect Predator section)	14 - Soybeans 3 - Forage 12 - Hay	48 hrs
	Moderate to severe infestations	1/4 – 1/2		
	Soybean Aphid	1/6 -1/3		
	Beet Armyworm Salt Marsh Caterpillar Bean Leaf Beetle Fall Armyworm Thrips Silver Spotted Skipper - Light to moderate infestations	1/4 – 3/8		
	Silver Spotted Skipper - Moderate to severe infestations	3/8 – 1/2		!
_	Do not apply more than 1.5 pounds acre per crop. Do not make more th			
Spinach	Alfalfa Looper Cabbage Looper Beet Armyworm Fall Armyworm	1/2 - 1	7	48 hrs
	Variegated Cutworm	1/2		
	Do not apply when minimum daily to Do not apply to seedlings less than Do not apply more than 4 pounds o per crop. Do not make more than 8 applications.	3" diameter f NUDRIN SP INSE		

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	To Harvoet	REI
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 - Tops 21- Roots	48 hrs
]	Variegated Cutworm	1/2		
	per crop. Do not make more than 10 application *Chemigation: NUDRIN SP INSECTION sprinkler chemigation to control beet yellowstriped armyworm. For best re	JDRIN SP INSECTICIDE may be applied by overhead ation to control beet armyworm, aphids and western be syworm. For best results, use the highest listed rate of ECTICIDE. Apply in 0.1 to 0.2 inches of water per acre.		

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Summer Squash* Including: Crookneck squash Straightneck squash Vegetable marrow Spaghetti squash Hyotan Cucuzza Hechima Chinese okra Bitter melon Balsam pear Balsam apple Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm Do not apply more than 6 pounds of per crop. Do not make more than 12 application*Fruit of the Gourd (Cucurbit accae) immature, 100% of the fruit is edible be stored, has a soft rind which is eat harvested they would not germinate.	ons per crop. family that are cor cooked or raw, on	nsumed when ce picked cannot	48 hrs
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs
	Do not apply more than 3 pounds of per crop. Do not make more than 4 application		ECTICIDE per acre	

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Tobacco (Except shade)	Flea Beetle Hornworm	1/4 – 1/2	5 - Flue cured 14 - Air or fire cured	48 hrs
	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2		
	Do not apply more than 2.5 pounds acre per crop. Do not make more than 5 applicatio		SECTICIDE per	
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs
:	Variegated Cutworm	1/2		
	Do not apply more than 7 pounds of per crop. Do not make more than 16 application * For tomatillos do not apply more the INSECTICIDE per acre per crop. Do not make more than 5 application	ons per crop nan 5 pounds of NU		

Crops	Insects	Rate NUDRIN SP INSECTICIDE Lbs. Per Acre	Last Application -Days To Harvest	REI
Turf (For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes)	1 (2/5 oz. per 1000 sq. ft.)		48 hrs
	Do not apply more than 4 pounds of per crop. Do not make more than 4 application Do not graze or feed.		:CTICIDE per acre	
Wheat (States of Idaho, Oregon, and	Armyworms Cereal Leaf Beetle* Aphids**	1/4 – 1/2	7	48 hrs
Washington only)	Do not apply more than 2 pounds of per crop. Do not make more than 4 application Chemigation: NUDRIN SP INSECTIC sprinkler chemigation. For best resul NUDRIN SP INSECTICIDE. Apply in See CHEMIGATION section for more *Cereal leaf beetle: NUDRIN SP INS ovicidal effect on cereal leaf beetle e label directions. Application should b appearance of newly laid eggs or in a maximum ovicidal effect. Use on this registered in California. **Aphids: For aphid control, crop mu under stress from adverse environmentemperatures or drought). Application begin when aphid population is low (ns per crop. CIDE may be applets, use the highest 0.1 to 0.2 inches information. ECTICIDE can proggs when applied e timed to correspanticipation of egg pest stage (egg) st be actively growental conditions (see on Russian who	ied by overhead t listed rate of of water per acre. ovide contact according to ond with the hatch to achieve is not currently ving and not uch as, extreme eat aphid need to	

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50° F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam North America, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam North America, Inc. and Seller harmless for any claims relating to such factors.

Rotam North America, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam North America, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM NORTH AMERICA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE

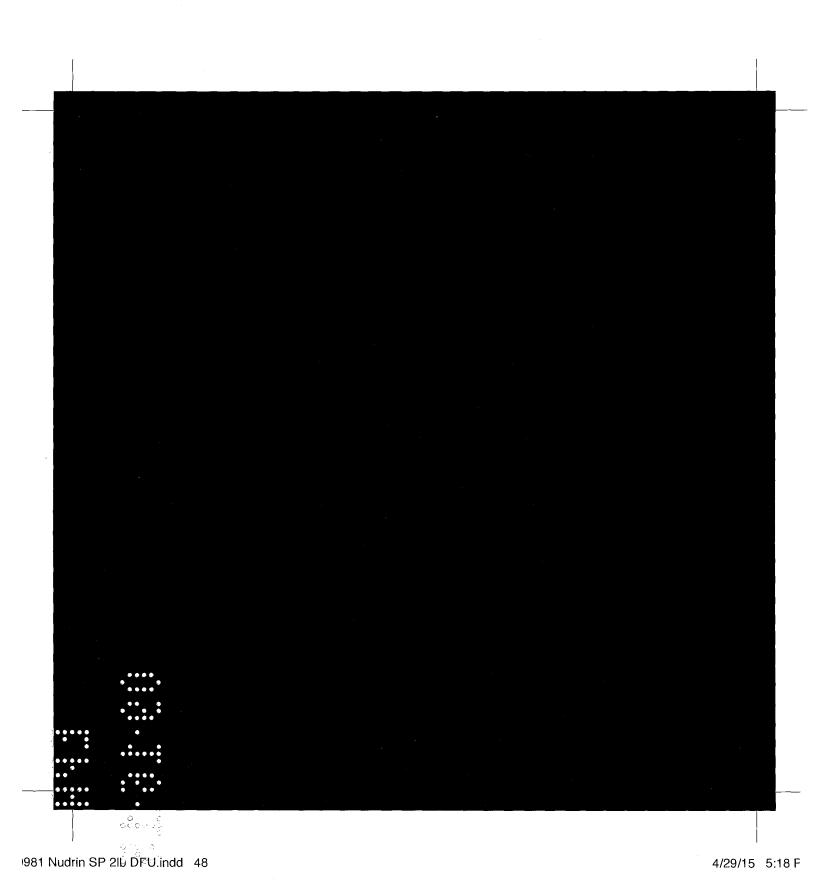
To the extent consistent with applicable law, Rotam North America, Inc. or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF Rotam North America, Inc. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF Rotam North America, Inc. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Rotam North America, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam North America, Inc..

Manufactured for: ROTAM NORTH AMERICA, INC. 4900 Koger Blvd., #140 Greensboro, NC 27407 1-866-927-6826

46

81 Nudrin SP 2lb DFU.indd 47



RESTRICTED USE PESTICIDE DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

> **GROUP** INSECTICIDE

INSECTICIDE In Water Soluble Packets

Active Ingredient By Weight Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioacetimidate)........................90% Other Ingredients 10%

KEEP OUT OF REACH OF CHILDREN POISON

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

> **Net Contents: 2 lb** EPA Reg. No.: 83100-28-83979 EPA Est. No.: 88159-TWN-001

Manufactured for: ROTAM NORTH AMERICA, INC. 4900 Koger Blvd., Suite #140 Greensboro, NC 27407 1-866-927-6826

PRODUCT OF TAIWAN



See inside label booklet for First Aid, additional Precautionary Statements, and Directions for Use.

MUDSP-02-A021915-REVB042915-2LB

SEE DIRECTIONS FOR USE INSIDE BOOKLET BELOW

NOTE: Remove booklet through perforated plastic envelope after breaking perforations. Do not pull plastic envelope away from package; this might tear package and expose the contents.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangenne = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

Coveralls

Chemical-resistant gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all ≥14 mils

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Protective eyewear
Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse

RESTRICTED USE PESTICIDE

DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application. mixing loading, repair or cleaning of application equipment

Vater Soluble Packet

EPA Est. No.: 88159-TWN-001

GROUP

1A INSECTICIDE

By Weight Active Ingredient Methomyl (S-methyl-N-)(methylcarbamoyl) oxyl 90% thioacetimidate Other Ingredients..... 10% TOTAL EPA Reg. No : 83100-28-83979

KEEP OUT OF REACH OF CHILDREN DANGER 🙊 POISON PELIGRO

Si usted no entiende la eliqueta, busque a alguen para que se la explique a usted en detalle, (If you do not uniterstand the label, find someone to explain it lo you in detail.)

FIRST AID
(CONTAINS AN N-Methyl Carbamate Insecticide
THAT INHIBITS CHOLINESTERASE)
IF SWALLOWED: Call a poison control center or doctor
immediately for freatment advice. Have person sip a glass of
water if able to swallow. Do not induce vomiting unless told to
by a poison control center or doctor. Do not give anything to an scious person.

by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person lo firesh air if person is not breathing, call \$11 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible, Call a potson control center or doctor for further treatment advice.

If IN EYES: Hold eye open and tinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first similaries, then continue inising eye, Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE — SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING. If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS — Methorny posioning produces offacts associated with anticholinesterase activity which may include weakness, blumed vision, headden, nausea, addominal carmus, disconflot in the chest, considerio, nausea, addominal carmus, disconflot in the chest, considerio, nausea, addominal carmus, disconflot in the chest, considerio, nausea, addominal first and a section and seek medical attention at once.

NOTE TO PHYSICIAN

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric

TREATMENT — Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg, introvenously every 10 to 30 minutes until full atropinization as achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibition until recovery is assured. Do not use 2-PAM for exposure to NUCRIN SP INSECTICIDE and organizations of NUDRIN SP INSECTICIDE and organizations us insections, 2-PAM may be used as coquired to supplement the atropine sulfate treatment. Do not use morphise.

not use morphine.

Have the product container or label with you when calling a poison control center or object, or going for treatment you may also contact the National Poison Control Center 24 hr Emergency Holline at. 1-800-222-1222.

PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Restricted Use Pesticide due to toxicity categories. For retail sale
to and use only by Certified Applicators or persons under their
direct supervision and only to those uses covered by the Certified
Applicator's certification.
Fatal if swalkowed. May be fatal if inhaled or gets in eyes. Do not
breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE) Mixers, loaders, applicators, cleaners, repairers o application equipment, and others exposed to the concentrate must wear: Long sleeve shirl and long pants

- Chemical-resistant gloves, such as benter laminate or butyl
- Socks and chemical resistant footwear

Socks and chemical retistant footweat
Protective syewear
Chemical resistant apron
Respirator with either an organic vapor-removing cartridge
with a prafiler approved for pesticides (MSHANNOSH
approval number prefix TC-23C), or a carletter approved for
pesticides (MSHANNOSH approval number prefix TC-14G),
or a NIOSH approved respirator with an organic vapor (OV)
cartridge or a canister with any R, P, or HE prefiller
Discard clothing or other absorbert materials that have been
drenched or heavily contaminated with this product's concentrate.
Do not reuse them Follow manufacturer's instructions for
cleaning/maintaining PPE. If no such instructions for washables,
use detergent and hor water. Keep and wash PPE separately from
other laundry. other (Bundry

ENGINEERING CONTROL STATEMENTS

ENGINEERING CONTROL STATEMENTS
Human flaggers must be in enclosed cabs,
When handlers use closed systems, enclosed cabs,
When handlers use closed systems, enclosed cabs, or aircraft,
in a manner that meate the requirements listed in the Worker
Protection Standard (WPS) for agnicultural pesticides (40 CFR part
170:240 (d)(4-6)). The handler PPE requirements may be reduced
or modified as systemed in the WPS.
The enclosed cabs must be used in a manner that meets the
requirements listed in the Worker Protection Standard (WPS) for
agricultural pesticides (40 CFR part 470:240 (d)(4-6)). The handler
PPE requirements may be reduced or modified as specified in the
WPS.

WPS.
Water soluble packets when used correctly quality as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water soluble packets are permitted to wear long-steeved shirt, long pants, shoes plus socks, chemical-resistant opens, provided the other reguired PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading

- USER SAFETY RECOMMENDATIONS
 USERS SHOULD:
 Wash inforcupily with soap and water after handling and
 before eating, drinking, chewing gum, or using tobacco or
 using the total.
 Remove dothing immediately if pesticide gets inside. Then
- deng red doming immediately if pesticide gets incide. Then Remove doftning immediately if pesticide gets incide. Then wash thoroughly and put on clean plottning. Remove personal protective equipment immediately after handing this product.

- Wash the outside of gloves pelore removing. As soon as possible, wash thoroughly and change into clean
- cothing.

 Remove and wash contaminated clothing before reuse

ENVIRONMENTAL HAZARDS

This pesticide is tokic to fish, aqualic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and ninoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washvater or insiste. washwater or rinsate

wastwater or finsate. This product is nightly tokic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

where the water table is shallow, may result in groundwater contamination. This chemical can contaminate surface water through spray drill. Under some conditions, it may also have a high potential for runof into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that frain to aurface water, represent a reas and areas overlaying surface waters with vegetated field ships, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

See Directions for Use and Storage and Disposal statements inside

Manufactured for: ROTAM NORTH AMERICA, INC., 4986 Koger Blyd., Suita #140, Greensbord, NC 27407 1-866-927-6825 NUDSP-04-A021915-REVB042916-2LB

Net Contents: 2 lb

PRODUCT OF TAIWAN





NUDRIN SP

Contains 90% Methomyl RESTRICTED USE PESTICIDE

Keep Out of Reach of Children



PRODUCT OF TAIWAN

Refer to full label for complete use instructions and precautions EPA Reg No: 83100-28-83979 2 pounds

79981 Nudrin SP 2lb PVA BAG.indd 1

4/29/15 5:03 PM

RESTRICTED USE PESTICIDE

DUE TO HIGH ACUTE TOXICITY TO HUMANS

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

INSECTICIDE In Water Soluble Packets

Active Ingredient	By Weight
Methomyl (S-methyl-N-[(methylcarbamoyl) oxy]thioace	etimidate)90%
Other Ingredients	
TOTAL	
EPA Reg. No.: 83100-28-83979	

EPA Est. No.: 88159-TWN-001

See additional Precautionary Statements and Directions for Use Inside label booklet.

Manufactured for ROTAM NORTH AMERICA, INC. 4900 Koger Blyd., Suite #140, Greensboro, NC 27407 1-866-927-6826

PRODUCT OF TARKEN



KEEP OUT OF REACH OF CHILDREN DANGER POISON PELIGRO

GROUP 1A INSECTICIDE

Net Contents: 12 lb (6 - 2 lb envelopes)

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle, (If you do not understand the label, find someone to explain it to you in detail.)

(CONTAINS AN N-Methyl Carbamate Insecticide THAT INHIBITS CHOLINESTERASE)

IF SWALLOWED: Call a poison control centur or doztor immediately for treatment advoce. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control centur or doztor. To not give anything to an unconscitus person.

If INHALED: More person to finish acc if person is not breaking, cut 91 i or an ambulance. Itempare antificial respiration, preferably by mouth-to-mouth, if possible. Cat is poison control center or discrete for further

PEIN EVESS: rials eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after true first 5 minutes, then continue rinsing eye. Call a porson control service or clock of fer

ATROPINE IS AN ANTIDOTE - SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If polisoring spipers appear (see POISORNOS SYMPTOMS), get medical attention.

POISORING SYMPTOMS — Not provided the polisoring produces affects associated with articlochinesterace activity which may include weakness, blumed vision, handdedne, neuses, abdominal cramps, discomfort in the chapt, cramption of pupils, weaking allow public, muscle terrors, if polisoring symptoms appear, refer to First Aid tection and seek medical attention at once.

NOTE TO PHYSICIAN

TREATMENT — Arroging suifale should be used for treatment. Administer repealed dosse, 1.2 to 2.0 mg. intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Additional respiration or oxygen may be necessary. Alow no further exposure to any cholinesterase inhibitor until recovery is acsumed.

Co not use 2-FAM for exposure to NUDRRY SP INSECTICIDE sidns. However, for exposure to combinations of NUDRIN SP INSECTICIDE and arganophospharaus insecticides, 2-PAM may be used as required to supplement the arrogine suttles treatment. Do not use morphine.

These the ground traditions of substances with your years calling a poison control center or doctor, or going for treatment.

You may also contect the National Poison Control Center 24-hr Emergency Hottine at: 1-800-222-1222

NUDSP-03-A021915-REVB042915-2LB

79981 Nughti SP 2th CASE indd 1

4/29/15 5:15 PM

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's confidention. Fatel if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid. contact with clathing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equip others exposed to the concentrate must wear:

- Long sleeve shirt and long pants
- Chemical-resistant gloves, such as barrier unminate or buty) nubber
 Socks and chemical resistant footwear
- Protective eyewear
 Chemical resistant apron
- Respirator with either an ecoanic vapor-removing cartridge with a prefilter approved for pesticides (MSHAVNIOSH approval number prefix TC-23C), or a canister approved for pasticides (MSHAV NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (CIV) cattridge of a canister with any R, P, or HE preliter
 Ciscard plothing or other absorber materials that have been directed or heavily contaminated with this products.

contentrate. Do not reuse them Follow manufacturer's instructions for pleaning/maintaining PPE If no such instructions for washables, use detergent and not water. Keep and wash PPE separately from other laundry

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use plased systems, enclosed cabs, or awaraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CPR part 170 240 (d)(4.6)), the handler PPE frequirements may be reduced or modified as spendled in the WPS. The enclosed cable multiple used if a manner that meets the requirement false in the Worker Protection

Standard (WPS) for agricultural posticides I40 CFR part 170.240 (d)(4-5)] The handler PPE require be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers, handling this product while it is enclosed in intact water-soluble products are permitted to weer long-sleeves. shirt, long pants, shoes plus socks, chemical-resistent gloves, and chemical-resistant opron, providing the offier required PPE is immediately available in case the pag is opened.

Pilots must not assist in the mixing and loading operations.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aqualic invertabrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertitial areas below the mean high-water mark. Drift and runoff may be headed us to aquatic organizations in ineighboring alreas. Do not conferendat water when disposing of equipment washwater or riosete

washinglef or installer.
This product is highly toxic to be a dyposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is hown to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shollow, may result

in groundwater contamination
This observer This chamical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters. frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-leid canals of ditches that drain to surface whilet, areas not separated from adjacent surface waters with vegetated filter strips, and areas averlaying tile drainage systems that drain to surface water

PHYSICAL AND CHEMICAL HAZARDS

Keey container closed. Use with adequate ventilation

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Plotection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, breets, nursaries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontainstation, notification, and emergency assistance. If also contains specific instudence and exceptions perfaming to the statemente on this lated about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

On not enter or allow worker array into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day, REI apple, cotton, grapetruit, lemen, nectarine, prairge, tarigeto, tangerine = 3 day; all other WPS uses = 48 hour REI.

- PPE required to early entry to treated areas that is permitted under the Worker Protection Standar and that involves contact with anything that has been treated, such as plants, soil, or water is Coveralls
 - Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber
 - or nitrile rubber), all ≥14 mile Shoes plus socks

Discard clothing or other absorbent materials that have been grandled or heavily contaminated with this product's concentrate. Do not reuse them

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing curs, or using lobacco or using the toilet.
- Remove clothing immediately if posticide gets inside. Then wash focusphly and put all clean clothing
- · Remove personal protective equipment immediately after handling this product.
- Wash the outside of ployes before removing.
- As soon as possible, wash thoroughly and change into clear, clutting
- Remove and wash contaminated clothing before years.

STORAGE AND DISPOSAL

Do not contaminate water, lood, or leed by storage and disposa

PESTICIDE STORAGE: Hande this package carefully to prevent breakage of inner hag when stored at low temperatures. Allow to warm above 50°F for normal handling, Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for

PESTICIDE DISPOSAL: Posticide wastes are acutely hazardous, Improper dispusal of occess pesticide, spray mixture, or rimsaln is a validation of Federal Law, If these wastes cannot be disposed of by use according to label instructions, contact your State Posticide or Environmental Control Agency, or the Hazardous Waste representative at the neurest EPA Regional Office fol

CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the auter box or the CONTAINER DISPOSAL: For Water Soluble Packets: Do not reuse the outer box or the rescalable plastic bag. When all water-soluble packets, are used, the outer packeging should be clean and may be disposed of in a samilary landfall or by incineration, or if allowed by state and local authorities, by open turning, if our net, sitely out of smoke, if the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the fineals to the spray tank and dispose of the outler ways as described above.

For Paper and Flastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by whencher and the plant of the plant

burning. If burned, stay out of smoke

in the event of a major spill, fire or other emergency, call CHEMTRES Day or Night, 1-800-424-9300

80590 Nudrin SP 2lbs CARTON BACK Intid 1

//10/15 4:45 PM

PROCESSING REQUEST

Reg #: \$3700-28 Decision #: 497	7729
Description: Methonyl Mitigation Lab	/
3	
Material Available Electronically (see PPLS)):
Electronic Label/Letter Dated: 2//9/15	
Other:	
Material Sent (see jacket):	
Stamped Label/Letter Dated:	
☐ Notification Dated:	
☐ New CSF(s) Dated:	
Other:	
File this coversheet and attached materials in the jacket. It must be and clipped together, NOT STAPLED. Then give the jacket with the materials to staff in the Information Services Center (ISC) (Room Sjacket is full or only available as an image, please file materials in a bring it down to the (ISC). For further information please call 703-6	coversheet and 4900). If a new jacket and
Reviewer: Stitutas Gooded Carlyn Potolla	
Division: AD/RMB2 RDI 1VBZ	
Phone: 34-7-0439 Date: 11/25	XX 2119115
No.	,



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 19, 2015

Cheryl Wagner
Rotam Agrochemical Co. Ltd.
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Label Amendment – Methomyl Mitigation. Delete Uses on Barley, Oats and Rye.

Reduce Application Rates on Various Commodities. Product Name: Rotam Methomyl 90 SP Insecticide

EPA Registration Number: 83100-28 Application Date: January 16, 2015

Decision Number: 499729

Dear Ms. Wagner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 83100-28 Decision No. 499729

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Carlyn Petrella by phone at 703-347-0439, or via email at petrella.carlyn@epa.gov.

Sincerely,

Richard Gebken Product Manager 10

Invertebrate & Vertebrate Branch 2

Office of Pesticide Programs

Enclosure

RESTRICTED USE PESTICIDE

Due to High Acute Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's Certification. Direct supervision for this product requires the Certified Applicator to review federal and supplemental label instructions with all personnel prior to application, mixing, loading, repair or cleaning of application equipment.

GROUP

1A

INSECTICIDE

Rotam Methomyl 90SP Insecticide

In Water Soluble Packets

Active Ingredient:	By Weight
Methomyl	
(S-methyl-N-[(methylcarbamoyi)oxy]thioacetimidate)	90%
Other Ingredients:	<u>10%</u>
Total:	100%

ACCEPTED

02/19/2015

Under the Federal Insecticide. Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2004-00-00

83100-28

DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

[See [additional][complete] First Aid, Precautionary Statements, and Directions For Use inside label booklet [and back panel of cantoiner].

EPA Reg. No.: 83100-28

EPA Est. No.: 69821-CHN-005

Net Contents: Packets/Container TBA

Manufactured For [By]:

Rotam Agrochemical Co., Ltd. 26/F E-Trade Plaza 24 Lee Chung Street Chaiwan, Hong Kong

FIRST AID

(N-Methyl Carbamate insecticide)

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably- by-mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

ATROPINE IS AN ANTIDOTE -- SEEK MEDICAL ATTENTION AT ONCE IN ALL CASES OF SUSPECTED POISONING.

If poisoning symptoms appear (see POISONING SYMPTOMS), get medical attention.

POISONING SYMPTOMS - Methomyl poisoning produces effects associated with anticholinesterase activity which may include weakness, blurred vision, headache, nausea, abdominal cramps, discomfort in the chest, constriction of pupils, sweating, slow pulse, muscle tremors. If poisoning symptoms appear, refer to First Aid section and seek medical attention at once.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

TREATMENT - Atropine sulfate should be used for treatment. Administer repeated doses, 1.2 to 2.0 mg intravenously every 10 to 30 minutes until full atropinization is achieved. Maintain atropinization until the patient recovers. Artificial respiration or oxygen may be necessary. Allow no further exposure to any cholinesterase inhibitor until recovery is assured.

Do not use 2-PAM for exposure to ROTAM METHOMYL 90SP INSECTICIDE alone. However, for exposure to combinations of ROTAM METHOMYL 90SP and organophosphorous insecticides, 2-PAM may be used as required to supplement the atropine sulfate treatment.

Do not use morphine.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Poison Control Center 24-hr Emergency Hotline at: 1-800-222-1222.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER POISON



PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Restricted Use Pesticide due to toxicity categories. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

Fatal if swallowed. May be fatal if inhaled or gets in eyes. Do not breathe dust. Do not get in eyes. Avoid contact with clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, cleaners, repairers of application equipment, and others exposed to the concentrate must wear:

- Long sleeve shirt and long pants
- Chemical-resistant gloves, such as barrier laminate or butyl rubber
- Socks and chemical resistant footwear
- Protective eyewear
- Chemical resistant apron
- Respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or a canister with any R, P, or HE prefilter

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

Human flaggers must be in enclosed cabs.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR Part 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

The enclosed cabs must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR Part 170.240 (d)(4-6)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

Water soluble packets when used correctly qualify as a closed loading system under the WPS. Handlers handling this product while it is enclosed in intact water-soluble packets are permitted to wear long-sleeved shirt, long pants, shoes plus socks, chemical-resistant gloves, and chemical-resistant apron, provided the other required PPE is immediately available in case the bag is opened.

Pilots must not assist in the mixing and loading operations.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove personal protective equipment immediately after handling this product.
- Wash the outside of gloves before removing.
- As soon as possible, wash thoroughly and change into clean clothing.
- Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish, aquatic invertebrates, and mammals. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high-water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area. This chemical is known

to leach through soil into groundwater under certain conditions as a result of label use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, and areas overlaying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

PHYSICAL AND CHEMICAL HAZARDS

Keep container closed. Use with adequate ventilation.

DIRECTIONS FOR USE Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI). REI Summary: REI peaches = 4 day; REI apple, cotton, grapefruit, lemon, nectarine, orange, tangelo, tangerine = 3 day; all other WPS uses = 48 hour REI.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical Resistant Gloves Category A (such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber), all >14 mils
- Shoes plus socks
- Protective eyewear

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Do not formulate this product into other End-use products without written permission from Rotam.

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

ROTAM METHOMYL 90SP INSECTICIDE should be used only in accordance with directions for use on this label or in separate Rotam supplemental labeling. Rotam will not be responsible for use of the product in a manner not specified by Rotam in the product's labeling and User assumes all risk for such use.

ROTAM METHOMYL 90SP INSECTICIDE is a dry powder to be dissolved in water for application by mechanical ground, overhead sprinkler, or aerial application Hand-held equipment is prohibited for application to crops. Do not apply by ground equipment within 25 feet, or by air within 100 feet of lakes, reservoirs, rivers, estuaries, commercial fish ponds and natural, permanent streams, marshes or natural, permanent ponds. Increase the buffer zone to 450 feet from the above aquatic areas when ultra-low volume application is made.

Pilots must not assist in the mixing and loading operations.

Use only in commercial and farm plantings. Not for use in home plantings. Not for use during any period after a commercial crop site is opened for public entry as a "U-Pick", "Pick Your Own", or similar operation; in no case shall preharvest applications be made after first public entry. The restricted entry interval and preharvest interval for the crop stated elsewhere on this label must be followed.

RESISTANCE MANAGEMENT

For resistance management, ROTAM METHOMYL 90SP INSECTICIDE is a group 1A insecticide. Repeated and exclusive use of ROTAM METHOMYL 90SP INSECTICIDE or other group 1A insecticides may lead to the build-up of resistant strains of insects in some crops. Not all members of this group have been shown to be cross-resistant. Different resistance mechanisms that are not linked to target site of action, such as enhanced metabolism, are common for this group of chemicals. Alternation of compounds from different sub-groups within this group may be an acceptable part of an integrated pest management program.

Some insects are known to develop resistance to products used repeatedly for control. When this occurs, the recommended dosages fail to suppress the pest population below the economic threshold. Because the development of resistance cannot be predicted, the use of this product should conform to resistance management strategies established for the use area. These strategies may include incorporation of cultural and biological control practices, alternation of active classes of insecticides on succeeding generations and targeting the most susceptible life stage. Consult your local or state agricultural authorities for details.

If resistance to this product develops in your area, this product, or other products with a similar mode of action, may not provide adequate control. If poor performance cannot be attributed to improper application or extreme weather conditions, a resistant strain of insect may be present. If you experience difficulty with control and resistance is a reasonable cause, immediately consult your local company representative or agricultural advisor for the best alternative method of control for your area. For additional information on insect resistance monitoring, visit the Insecticide Resistance Action Committee (IRAC) on the web at http://www.irac-online.org.

INTEGRATED PEST MANAGEMENT

This product should be used as part of an Integrated Pest Management (IPM) program which can include biological, cultural, and genetic practices aimed at preventing economic pest damage. Application of this product should be based on IPM principles and practices including field scouting or other detection methods, correct target pest identification, population monitoring, and treating when target pest populations reach locally determined action thresholds. Consult your state cooperative extension service, professional consultants or other qualified authorities to determine appropriate action treatment threshold levels for treating specific pest/crop systems in your area.

SCOUTING

Monitor insect populations to determine whether or not there is a need for application of ROTAM METHOMYL 90SP INSECTICIDE based on locally determined economic thresholds. More than one treatment of ROTAM METHOMYL 90SP INSECTICIDE may be required to control a population of pests.

BENEFICIAL ARTHROPODS

ROTAM METHOMYL 90SP INSECTICIDE at rates of 1/8 to 1/4 lb. per acre helps conserve certain beneficials, including bigeyed bugs, damsel bugs, flower bugs, and spiders in cotton and soybeans. While these beneficials cannot be relied upon

to control pests, they are of potential value and should be monitored along with pests in pest management programs on these crops.

SPRAY PREPARATION

Spray equipment must be clean and free of previous pesticide deposits before applying ROTAM METHOMYL 90SP INSECTICIDE.

Fill spray tank 1/4 to 1/2 full of water. Add ROTAM METHOMYL 90SP INSECTICIDE directly to spray tank. Carefully open the outer barrier bag containing ROTAM METHOMYL 90SP INSECTICIDE in a water soluble bag. Do not cut open the outer barrier bag. Invert the outer barrier bag allowing the inner water soluble bag to fall directly into the spray tank. Do not allow packets to become wet prior to adding to the spray tank. Do not handle, open, rip, tear, cut or perforate the inner water soluble bag. Mix thoroughly to fully dissolve the insecticide; once dissolved continued agitation is not required. Use mechanical or hydraulic means; do not use air agitation. Be sure the soluble packet is completely dissolved before adding any other ingredients. Spray mix should not be stored overnight in spray tank.

Compatibility: Since formulations may be changed and new ones introduced, it is recommended that users premix a small quantity of a desired tank mix and observe for possible adverse changes (settling out, flocculation, etc.). Avoid mixtures of several materials and very concentrated spray mixtures.

Do not use ROTAM METHOMYL 90SP INSECTICIDE with Bordeaux mixture (copper sulfate and hydrated lime), "Du Ter" (triphenyltin hydroxide), lime sulfur, "Rayplex" iron nor in highly alkaline solutions. Use mildly alkaline mixtures immediately after mixing to prevent loss of insecticidal activity.

Tank-mix solutions containing Boron may affect solubility of the water soluble film. When using Boron containing solutions in a tank-mix, follow these procedures:

- Add the correct amount of ROTAM METHOMYL 90SP INSECTICIDE water soluble packets first.
- Be sure the soluble packets are completely dissolved.
- Introduce Boron containing solutions last.

If the above procedure cannot be followed, and Boron is an essential part of the spray mix, substitute ROTAM METHOMYL 29LV formulation for the water soluble packets.

Tank Mix Sequence: Add different formulation types in the sequence indicated below. Allow time for complete mixing and dispersion after addition of each product.

- 1. ROTAM METHOMYL 90SP INSECTICIDE and other products in water soluble bags.
- 2. Water dispersible granules.
- 3. Wettable powders.
- 4. Water based suspension concentrates.
- 5. Water soluble concentrates.
- 6. Oil based suspension concentrates.
- 7. Emulsifiable concentrates.
- 8. Adjuvants, surfactants, oils.
- 9. Soluble fertilizers.
- 10. Drift retardants.

Follow local practice and manufacturer's recommendation.

APPLICATION

Apply at the recommended rates when insect populations reach locally determined economic thresholds. Consult the cooperative extension service, professional consultants or other qualified authorities to determine appropriate threshold levels for treatment in your area.

Follow-up treatments of ROTAM METHOMYL 90SP INSECTICIDE should be applied, as needed, to keep pest populations within threshold limits. On most crops, ROTAM METHOMYL 90SP INSECTICIDE should be applied at 5- to 7-day intervals to maintain control. Refer to crop specific directions for use in the crop tables for more specific information on treatment intervals.

Use sufficient water to obtain thorough, uniform coverage. Since ROTAM METHOMYL 90SP INSECTICIDE is a fast acting contact insecticide, best results follow direct spraying of the target insect.

For aerial, use a minimum of 2 gals. per acre (gpa) except 10 gpa for peaches and nectarines; 15 gpa for oranges, lemons, grapefruit, tangelos, and tangerines.

For certain crops a minimum of 1 gallon per acre may be used providing the following conditions are met:

- Equipment is adjusted to distribute spray uniformly over the spray swath,
- wind conditions and other factors such as temperature and humidity are such that the spray is delivered to the target area,
- local regulations do not prohibit low-volume aerial sprays, and
- use rates are applied as directed on the package label or supplemental labeling for the following crops:

Alfalfa	Celery	Peas (succulent)
Anise	Collards	Peppermint
Asparagus	Corn	Peppers
Beans	Cotton	Potato
Broccoli	Cucumber	Soybean
Brussels sprouts	Lettuce	Spinach
Cabbage	Melons	Sugar beet
Carrot	Mint	Summer Squash
Cauliflower	Peanuts	Wheat

Apply the low rates on small plants, small insects and light infestations of insects. Use intermediate rates on large insects and heavier infestations of insects. Use 1 to 3 applications of the highest recommended rate for controlling severe infestations. Thereafter, use the lowest rate possible to maintain control.

SPRAY TANK CLEANOUT

Immediately following application, thoroughly clean all spray equipment to reduce the risk of forming hardened deposits which might become difficult to remove.

Drain spray equipment. Thoroughly rinse sprayer and flush hoses, boom and nozzles with clean water.

Clean all other associated application equipment. Take all necessary safety precautions when cleaning equipment. Do not clean near wells, water sources or desirable vegetation. Dispose of waste rinse water in accordance with local regulations.

CHEMIGATION

Instructions for the Use of ROTAM METHOMYL 90SP INSECTICIDE on Alfalfa, Green and Dry Bulb Onions, Potatoes,
Sugar Beets, and Wheat Using Overhead Sprinkler Chemigation

Do not apply thru Drip Chemigation unless accompanied by Rotam Supplemental Labeling.

Chemigation: Overhead sprinkler chemigation is allowed for use in alfalfa, onions, potatoes, sugar beets, and wheat. Refer to supplemental, or Special Local Need (SLN) labeling or the crop specific sections of this label for use directions for chemigation. Do not apply this product through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN or this product label.

Overhead chemigation applications offer the advantage of greater penetration and coverage of the target plant. However, typical chemigation applications are more dilute than ground or aerial applications. For best results, it is recommended to keep the concentration of ROTAM METHOMYL 90SP INSECTICIDE as high as possible in the application. Apply ROTAM METHOMYL 90SP INSECTICIDE in 0.1 to 0.2 inches of water per acre. ROTAM METHOMYL 90SP INSECTICIDE is most active as a contact insecticide, although it does also have activity via ingestion of treated plants. For best results, applications of ROTAM METHOMYL 90SP INSECTICIDE should take place when the insects are active and most likely to come into direct contact with the application.

Types of Irrigation Systems

ROTAM METHOMYL 90SP INSECTICIDE may be applied through overhead sprinkler irrigation systems for control of various pests. Center pivot and lateral move irrigation systems are preferred. Other overhead sprinkler systems; such as end tow, side (wheel) roll and solid set, may be used if they provide uniform water distribution. Do not use filter screens smaller than 50 mesh throughout the system, due to possible buildup of material on 100 mesh or smaller screens. Do not apply ROTAM METHOMYL 90SP INSECTICIDE through any other type of irrigation systems, except those allowed by instructions provided in a supplemental, SLN, or this product label.

General Directions for Chemigation

Preparation

A pesticide tank is recommended for the application of ROTAM METHOMYL 90SP INSECTICIDE in chemigation systems. Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Add 1/4 to 1/2 of the desired amount of water and then measure the required amount of ROTAM METHOMYL 90SP INSECTICIDE into the tank. Complete filling the tank by adding the required amount of water. Agitate thoroughly to insure a uniform solution of ROTAM METHOMYL 90SP INSECTICIDE. Once in solution, no further agitation is required. Injection solution should not be stored overnight. Highly alkaline water should be buffered so that the pH of the spray solution is in the range of neutral to slightly acidic (pH5-7).

Injection into Chemigation Systems

Inject the proper amount of the ROTAM METHOMYL 90SP INSECTICIDE solution to the irrigation water flow using a positive displacement injection pump. Injection should occur at a point in the main irrigation water flow to ensure thorough mixing with the irrigation water. For continuously moving systems, inject the solution containing ROTAM METHOMYL 90SP INSECTICIDE into the irrigation water line continually and uniformly throughout the irrigation cycle. Apply in no more than 0.2 inches of water per acre. For overhead sprinkler systems that are stationary, add the solution containing ROTAM METHOMYL 90SP INSECTICIDE to the irrigation water line, and apply no more than 0.2 inches of water per acre, just before the end of the irrigation cycle.

Uniform Water Distribution

The irrigation system used for application of ROTAM METHOMYL 90SP INSECTICIDE must provide for uniform distribution of ROTAM METHOMYL 90SP INSECTICIDE treated water. Nonuniform distribution might result in crop injury, lack of effectiveness or illegal pesticide residues in or on the crop being treated. Ensure the irrigation system is calibrated to uniformly distribute the chemigation application to the crop. Contact the equipment manufacturer, the local University Extension agent or other experts if you have questions about achieving uniform distribution of the application.

Equipment Calibration

Calibrate the irrigation system and injector before applying ROTAM METHOMYL 90SP INSECTICIDE. Calibrate the injection pump while the system is running using the expected irrigation rate. If you have questions about calibration, you should contact your state extension service specialists, equipment manufacturer or other experts.

Monitoring of Chemigation Applications

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of a responsible person, shall shut the system down and make necessary adjustments should the need arise. Wear the personal protective equipment as defined in the PPE section of the label for cleaners and repairers of application equipment when making adjustments or repairs on the chemigation system when ROTAM METHOMYL 90SP INSECTICIDE is in the irrigation water.

Required System Safety Devices

Do not connect any irrigation system used for pesticide applications to a public water system unless the pesticide label-prescribed safety devices are in place. Public water system means a system for the provision to the public of piped water for human consumption, if such a system has at least 15 service connections or regularly serves an average of at least 25 individuals at least 60 days out of the year.

- 1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
- 2. The pesticide injection pipeline must contain a functional, automatic, quick- closing check valve to prevent the flow of fluid back toward the injection pump.
- 3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- 4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- 6. Systems must use a metering pump such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- 7. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

Posting of Areas to be Treated

Posting of areas to be chemigated is required when 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, daycare centers, hospitals, in-patient clinics, nursing homes, or any other public areas such as schools, parks, playgrounds, or other public facilities not including public roads, or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Posting must conform to all the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated areas and in any other location affording maximum visibility to sensitive areas. The signs shall be printed in ENGLISH. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 2 1/2 inches tall, and all letters and the symbol shall be a color, which sharply contrasts with their immediate background. At the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDE IN IRRIGATED WATER". Posting for chemigation does not replace other posting and reentry requirements for farm worker safety.

Operation

Start the water pump and sprinkler, and let the system achieve the desired pressure and speed before starting the injector. Start the injector and calibrate the injection system according to the directions above. This procedure is necessary to deliver the desired rate per acre in a uniform manner. Apply ROTAM METHOMYL 90SP INSECTICIDE in 0.1 to 0.2 inches of water per acre. When the application is finished, allow the entire irrigation and injector system to be thoroughly flushed clean before stopping the system. End guns must be turned off during the application, if they irrigate nontarget areas or if they do not provide uniform application and coverage.

It is recommended that nozzles in the immediate area of control panels, chemical supply tanks, wellheads and system safety devices be plugged to prevent contamination of these areas.

Do not apply when wind speed favors drift beyond the area intended for treatment.

Do not apply when system connections or fittings leak or when nozzles do not provide uniform distribution.

Cleaning the System

Thoroughly clean the injection system and tank of any fertilizer or chemical residues using a standard clean-out procedure. Dispose of any residues in accordance with State and Federal laws. Consult your owner's manual or your local equipment dealer for cleanout procedures for your injection system.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

- 1. The distance of the outer most nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the <u>Aerial Drift Reduction Advisory Information</u>.

AERIAL DRIFT REDUCTION ADVISORY INFORMATION

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150 - 200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. APPLYING LARGER DROPLETS REDUCES DRIFT POTENTIAL, BUT WILL NOT PREVENT DRIFT IF APPLICATIONS ARE MADE IMPROPERLY OR UNDER UNFAVORABLE ENVIRONMENTAL CONDITIONS! See **WIND**, **TEMPERATURE AND HUMIDITY**, and **TEMPERATURE INVERSIONS** sections of this label.

Controlling Droplet Size – General Techniques

- **Volume** Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure
 produces larger droplets. Use the lower spray pressures recommended for the nozzle. Higher pressure reduces
 droplet size and does not improve canopy penetration. WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHERCAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.

• **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Controlling Droplet Size - Aircraft

- Number of Nozzles Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type** Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types and the lowest drift.
- **Boom Length** For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.
- Application Height Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.
- Swath Adjustment When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downward edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

BOOM HEIGHT

Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

WIND

Drift potential is lowest between wind speeds of 3-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. AVOID GUSTY OR WINDLESS CONDITIONS.

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

AIR ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air assisted field crop sprayers carry droplets to the target via a downward directed air stream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application, is configured properly, and that drift is not occurring.

Note: Air assisted field sprayers can affect product performance by affecting spray coverage and canopy penetration. Consult the application equipment section of this label to determine if use of an air assisted sprayer is recommended.

AIR ASSISTED (AIR BLAST) TREE AND VINE SPRAYERS

Air assisted tree and vine sprayers carry droplets into the canopy of trees and vines via a radially or laterally directed air stream. These sprayers are not suitable for applying herbicides. In addition to the general drift management principles already described, the following specific practices will further reduce the potential for drift:

Adjust deflectors and aiming devices so that spray is only directed into the canopy.

Block off upward painted nozzles when there is no overhanging conopy.

Use only enough oir volume to penetrate the canopy and provide good coverage.

Do not allow spray to go beyond the edge of the cultivated orea. Spray the outside row only from outside the planting.

CROP AND RATE CHARTS

Crops	Insects	Rate ROTAM METHOMYL 90SP Lbs. Per Acre	Last Application - Days To Harvest	REI
Alfalfa	Pea Aphid Lygus Bugs Blotch Leafminer Aphids Egyptian Alfalfa Weevil Larvae Loopers Beet Armyworm Armyworm Alfalfa Caterpillar Fall Armyworm Western Yellowstriped Armyworm Yellowstriped Armyworm	1/2 - 1	7*	48 hrs
	Alfalfa Weevil Larvae	1		
	Variegated Cutworm	1/4 - 1		

Anise (Fennel)	Do not apply to dormant or semi-dormant Do not apply more than 4 pounds of ROT. Do not make more than 10 applications page Chemigation: ROTAM METHOMYL 90SP I chemigation. For best results, use the hig Apply in 0.1 to 0.2 inches of water per act *Do not apply within 7 days of cutting or Cabbage Looper Beet Armyworm Do not apply more than 5 pounds of ROTAM Control of ROTAM Control of ROTAM Control of ROTAM Control of ROTAM Control of ROTAM CONTROL OF ROTAM CONT	AM METHOMYL 90SP II ber crop. NSECTICIDE may be apples to listed rate of ROTA re. See CHEMIGATION s allowing livestock to gr 1 1/2 - 1 AM METHOMYL 90SP II	NSECTICIDE per acre per olied by overhead sprink AM METHOMYL 90SP IN ection for more informa aze.	crop. ler SECTICIDE, ation. 48 hrs.	
Apple (Ground application only)	Tufted Apple Budmoth Green Fruitworm Tarnished Plant Bug Codling Moth (10-12 day spray intervals)	1/2 - 1*	14	72 hrs.	
	Leafrollers (Fruit-tree, Obliquebanded, Redbanded, Variegated) Lesser Appleworm White Apple Leafhopper Tentiform Leafminer Cutworm	1*			
	Do not use on Early Macintosh & Wealthy varieties Do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 5 applications per crop; minimum interval between treatments is 7 days. *Apply in a minimum of 50 gallons of water per acre.				
Asparagus	Beet Armyworm Western Yellowstriped Armyworm Asparagus Beetle Spotted Asparagus Beetle White Cutworm Redbacked Cutworm	1/2 - 1	1	48 hrs.	
	Variegated Cutworm 1/2 Do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop.				
Avocado	Western Avocado Leafroller Omnivorous Looper Do not apply more than 1 pound of ROTAM METHOMYL 90\$P INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.		48 hrs.		

Beans (Succulent)	Leafhopper Mexican Bean Beetle	1/4 - 1			
Including:	Fall Armyworm				
_	Variegated Cutworm	1/2			
Navy, Pinto, Snap,	Beet Armyworm		1		
Wax, Broad, Fava,	Corn Earworm				
Asparagus,	Saltmarsh Caterpillar		Succulent Beans 1/4 - 1/2 lb, 1		
Blackeyed peas, Cowpeas,	Yellowstriped Armyworm				
	Western Yellowstriped Armyworm				
Chick peas,	Lygus Bugs		over 1/2 lb 3		
Garbanzo beans,	Thrips		3 Vines		
Sweet lupine,	Aphids	1/2 - 1	7 Hay		
White sweet lupine,			,,	48 hrs.	
	European Corn Borer (Ovicide &				
upine	Larvicide) Initiate when moth flights				
	first appear and-continue preventive				
	treatments at 3-4 day intervals to				
	control eggs and larvae.				
	Spotted Cucumber Beetle	1/4 - 1/2			
	Succulent Beans -				
	Do not apply more than 5 pounds of ROTA	M METHOMYL 90SP	INSECTICIDE per acre per		
	crop.				
	Do not make more than 10 applications per crop.				
	*Do not use for Loopers in AL & GA.				
Beans	(Follow Beans, Succulent)		14 - Dry Beans*	-	
(Dry)	(Follow Bearls), Succurerry	(Follow Beans,	14 - Vines*		
Follow Beans,		Succulent)	14 - Hay*		
Succulent)					
,	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per				
	crop.				
		er crop		48 hrs.	
	Do not make more than 10 applications pe	er crop.		48 nrs.	
	Do not make more than 10 applications pe Do not use for Loopers in AL & GA.	er crop.		48 hrs.	
Beets	Do not make more than 10 applications pe Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting.			48 hrs.	
	Do not make more than 10 applications pe Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm	2/4 - 1		48 hrs.	
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm	1/4 - 1	0 - roots	48 hrs.	
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper		0 - roots 10 - tops	48 nrs.	
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth	1/4 - 1	0 - roots 10 - tops		
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle	1/4 - 1		48 hrs.	
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm	1/4 - 1 1/2 - 1	10 - tops		
Beets (Table)	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA	1/4 - 1 1/2 - 1	10 - tops		
	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop.	1/4 - 1 1/2 - 1 1/2 .M METHOMYL 90SP	10 - tops		
Table)	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per	1/4 - 1 1/2 - 1 1/2 .M METHOMYL 90SP	10 - tops		
Table) Bermudagrass	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm	1/4 - 1 1/2 - 1 1/2 M METHOMYL 90SP crop.	10 - tops INSECTICIDE per acre per		
Table) Bermudagrass	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm	1/4 - 1 1/2 - 1 1/2 .M METHOMYL 90SP	10 - tops INSECTICIDE per acre per 7 - Forage*		
Table) Bermudagrass	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm Striped Grass Looper	1/4 - 1 1/2 - 1 1/2 M METHOMYL 90SP crop.	10 - tops INSECTICIDE per acre per 7 - Forage* 3 - Dehydrated Hay**		
Table) Bermudagrass pasture	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm Striped Grass Looper Do not apply more than 1 pound of ROTAN	1/4 - 1 1/2 - 1 1/2 M METHOMYL 90SP crop.	10 - tops INSECTICIDE per acre per 7 - Forage* 3 - Dehydrated Hay**	48 hrs.	
Table) Bermudagrass pasture	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm Striped Grass Looper Do not apply more than 1 pound of ROTAN crop.	1/4 - 1 1/2 IM METHOMYL 90SP crop. 1/4 - 1	10 - tops INSECTICIDE per acre per 7 - Forage* 3 - Dehydrated Hay**		
Table) Bermudagrass pasture	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm Striped Grass Looper Do not apply more than 1 pound of ROTAN crop. Do not make more than 2 applications per Do not apply more than 3 pound of ROTAN crop.	1/4 - 1 1/2 IM METHOMYL 90SP crop. 1/4 - 1 M METHOMYL 90SP III crop.	10 - tops INSECTICIDE per acre per 7 - Forage* 3 - Dehydrated Hay** NSECTICIDE per acre per	48 hrs.	
Table) Bermudagrass pasture	Do not make more than 10 applications per Do not use for Loopers in AL & GA. *Do not apply within 14 days of cutting. Imported Cabbageworm Beet Armyworm Cabbage Looper Diamondback Moth Cucumber Beetle Variegated Cutworm Do not apply more than 4 pounds of ROTA crop. Do not make more than 8 applications per Fall Armyworm Armyworm Striped Grass Looper Do not apply more than 1 pound of ROTAN crop.	1/4 - 1 1/2 IM METHOMYL 90SP crop. 1/4 - 1 M METHOMYL 90SP II crop. age or allowing livest	10 - tops INSECTICIDE per acre per 7 - Forage* 3 - Dehydrated Hay** NSECTICIDE per acre per	48 hrs.	

				Page 15 of
Blueberries	Blueberry Leafhopper Aphids Tussock Moth Weevil Sharp-Nosed Leafhopper	1/2		
	Cranberry Fruitworm* Cherry Fruitworm*	1/2 - 1	3	
	Flea Beetle (larvae) Sawfly (larvae) Blueberry Leafroller	1		48 hrs.
	Blueberry Maggot	1/4 - 1/2		
	Do not apply during bloom. Do not apply more than 4 pounds of R crop. Do not make more than applications p *For ground use only.		NSECTICIDE per acre per	
Broccoli	Loopers Diamondback Moth	1/2 - 1**	3	
	Imported Cabbageworm	1/4 - 1**		
	crop Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. **Add a wetting agent to improve coverage.			
Brussels Sprouts	Loopers Imported Cabbageworm Diamondback Moth	1/2 - 1**	3	48 hrs.
	Variegated Cutworm	1/2**		
Cabbage	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop; minimum interval between treatments is 2 days. **Add a wetting agent to improve coverage. Loopers* Diamondback Moth 1/2 - 1**			
	Fall Armyworm		1	
	Imported Cabbageworm	1/4 - 1**		
	Variegated Cutworm 1/2** Do not apply more than 8 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 15 applications per crop; minimum interval between treatments is 2 days. * Do not use for Loopers in AL & GA. **Add a wetting agent to improve coverage.			48 hrs.
Carrot	Beet Armyworm Armyworms Aster Leafhopper	1/2 - 1	1	
	Variegated Cutworm	1/4 - 1/2		
	Do not apply more than 7 pounds of Recrop. Do not make more than 10 application	OTAM METHOMYL 90SP IN	NSECTICIDE per acre per	48 hrs.

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Cauliflower	Imported Cabbageworm	1/4 - 1**		
	Loopers Diamondback Moth	1/2 - 1**	3	48 hrs.
	Variegated Cutworm	1/2**		
	Do not apply more than 8 pounds of ROTA Do not make more than 10 applications p **Add a wetting agent to improve covera	er crop; minimum int		
Celery	Beet Armyworm	1/2 - 1		
	Aster Leafhopper	1/2-1		
	Loopers	1	7	
	Variegated Cutworm	1/2		48 hrs.
	Armyworms	1/4 - 1		40 (113.
	Do not apply more than 7 pounds of ROTA crop. Do not make more than 8 applications per		INSECTICIDE per acre per	
Chicory	Beet Armyworm Variegated Cutworm Leafhoppers	1/2 - 1	80	48 hrs.
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			
Chinese Cabbage	Loopers Beet Armyworm	1/2 - 1*	10	
	Do not apply more than 8 pounds of ROTAM METHOMYL 90SP INSECTICIDE/acre/crop. Do not make more than 10 applications/crop. *Minimum of 25 gallons water per acre by ground or 5 gallons by air.			
Collards (Fresh market only)	Diamondback Moth Variegated Cutworm	1/2		
	Imported Cabbageworm Beet Armyworm Loopers*	1/2 - 1	10	
	Do not apply when temperature is less that Do not apply when crop is less than 10" to Do not apply more than 6 pounds of ROTA crop. Do not make more than 8 applications per *Do not use for Loopers in AL & GA.	II. M METHOMYL 90SP	INSECTICIDE per acre per	48 hrs.
Corn (Field, Popcorn & Seed)	Earworm (Ovicide/Larvicide) Armyworm Fall Armyworm European Corn Borer- Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 - 1/2	21 - Ears 3 - Forage* 21 - Stover*	48 hrs.
	Variegated Cutworm			

				Page 17 of 2
	Do not apply more than 2.5 pounds of Reper crop. Do not make more than 5 applications per crop then forage is green actively growing plants of the plants can be fed directly to animal parts of the plant that remain after removemental stalks and leaves can be fed at Timing of applications: Do not make more push. Make 1 application when corn is at make a second application, if needed, 5-	er crop. lants that are harvested is or used to make silage. oval of the grain at full plays roughage to animals. The than two applications to the control of the grain at full plays are than two applications to the control of the c	with the ears intact, Corn stover are the ant maturity. These to corn prior to tassel	
Corn	Earworm - Whorl as needed	1/3 - 1/2		
(Sweet)	Fall Armyworm Armyworm Earworm - (Ovicide/Larvicide) European Corn Borer - Ears 1-3 days or as needed Corn Rootworm (adult beetles) Flea Beetles Picnic Beetles Aphids	1/4 - 1/2	0 - Ears 3 - Forage 21 - Stover	
	Variegated Cutworm Beet Armyworm	1/2		48 hrs.
	Certain hybrid varieties of sweet corn are susceptible to methomyl injury. Treat a small area to determine crop safety before full scale spraying. Do not apply more than 7 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 28 applications per crop; minimum interval between treatments is 1 day. Timing of applications: Do not make more than two applications to corn prior to tassel push. Make 1 application when corn is at 1-2 leaf stage for control of early season pests; make a second application, if needed, 5-7 days later.			
Cotton All U.S.	Ovicide/Larvicide - Bollworm, Tobacco Budworm (Initiate schedule when significant numbers of eggs are present. Continue at 3- to 5-day intervals while eggs are present and larval control is adequate. If significant larvae survive, use higher rates below.), Lygus Bugs/Plant Bugs (adults and nymphs) start treatment on low level population for suppression.	1/8 - 1/4 (see Insect Predator Section)	15	72 hrs.
	Cotton Leafworm	1/4 - 1/2		
	Cotton Fleahopper (as needed)	1/8 - 1/4		
	Aphids Thrips	1/4		

East of Rockies	(Early Season)			1 480 20 012
Only	Bollworm, Tobacco Budworm, Beet			
	Armyworm, Cotton Leafperforator, Fall			
	Armyworm, Lygus Bugs/Plant Bugs	·		
	(adults and nymphs)	1/2		
	Use as occasional spray in regular			
	schedule but not more often than every		•	
	10 days.			
East of Rockies	(Late Season) Bollworm, Tobacco			
Only	Budworm, Beet Armyworm, Cotton]
	Leafperforator, Fall Armyworm, Lygus			
	Bugs/Plant	1/2 - 3/4		
	Bugs (adult and nymphs). Up to 3			ļ
	applications at 3-5 day intervals after			Į
	desired boll load set on plants.	ļ	•	
Texas	Cotton Aphid	1/4 - 2/3	15	
West of Rockies	Larvicide for worms	1/4 2/3		
only	Bollworm, Fall Armyworm, Tobacco			
,	Budworm,	1/2 - 3/4		
	Lygus Bugs	1,2 3,		72 hrs.
	Beet Armyworm			
	Cotton Leafperforator	1/3 - 3/4		
	For applications West of the Rockies, ma		day intervals after	
	desired boll load set on plants.			}
	desired boil load set on plants.			*
		For all cotton applications:		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per			
ų.	crop.			l
	Do not make more than 8 applications per crop.			
	Use may redden cotton. If excessive stop or alternate with other insecticides.			
······································	Do not graze or feed.			
Cucumber	Loopers			
	Tobacco Budworm			
	Beet Armyworm			
	Yellowstriped Armyworm			1
	Granulate Cutworm	1/2 1	4 /2 !!	
	Flea Beetles	1/2 - 1	1/2 lb 1	1
	Cucumber Beetles		Over 1/2 lb 3	40.
	Melon Aphid		•	48 hrs.
	Melonworm Pickleworm			
	Fall Armyworm			
		1/2		
	Variegated Cutworm	1/2	NISECTICIDE por acro por	
	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per			
	crop. Do not make more than 12 applications p	er cron		
		1/4 - 1	5	48 hrs.
Eggplant	Green Peach Aphid	1/4 ~ L	<u> </u>	40 1115.

				Page 19 of
	Tomato Pinworm (Ground Application only) Beet Armyworm Corn Earworm	1/2 - 1		
	Do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 10 applications per crop.			
Endive, Escarole	Beet Armyworm 1/2 - 1 10 Do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop.			48 hrs.
	Do not make more than 8 applications per crop.			
Garlic	Beet Armyworm 1/2 ** 7 Do not apply more than 3 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 6 applications per crop. **Add a wetting agent to improve coverage.			48 hrs.
Grapefruit CA, AZ & HI only	Thrips Fruit-tree Leafroller Orange Tortrix Western Tussock Moth Beet Armyworm	1/2 - 1	1	72 hrs.
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			
Horseradish Ground application	Aphids Thrips	1/2	65	
only	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			48 hrs.
Leafy Green Vegetables: Beet (tops), Dandelions, Kale, Mustard Greens, Parsley, Swiss Chard, Turnip Greens	Beet Armyworm Cabbage Looper* Diamondback Moth Imported Cabbageworm	1/2 - 1	10	40.1
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop. *Do not use for Cabbage Loopers in AL & GA.			48 hrs.
Lemon CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs.
	crop.	ot apply more than 3 pounds of ROTAM METHOMYL 90SP INSECTICIE ot make more than 4 applications per crop.	P INSECTICIDE per acre per	
Lentils	Western Yellowstriped Armyworm			
	Do not apply more than 1 pound of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			48 hrs.
Lettuce	Alfalfa Looper	1/4 - 1	1/4 - 1/2 lb 7	48 hrs.

			-	Page 20 of
(Head and Leaf varieties)	Thrips Aphids Beet Armyworm Cabbage Looper Corn Earworm Aster Leafhopper	1/2 - 1	Over 1/2 lb 10	
	Variegated Cutworm	1/2		
	Lettuce (head varieties) Do not apply more than 6.3 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 12 applications per crop; minimum interval between treatments is 2 days. Lettuce (leaf varieties) Do not apply more than 4 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 2 days.			
Melons Including: Cantaloupe, Casaba Santa Claus melon, Crenshaw melon, Honeydew melon, Honey balls, Persial melon, Golden Pershaw melon, Mango melon, Pineapple melon,	Loopers Tobacco Budworm	1/2 - 1	1/2 lb 1 Over 1/2 lb 3	48 hrs.
Snake melon,	Variegated Cutworm	1/2		
Watermelon	Do not apply more than 6 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 12 applications per crop.			
Wint	Variegated Cutworm	1		
Peppermint,	Alfalfa Looper		14	48 hrs.
pearmint)	Flea Beetles	3/4 - 1	<u> </u>	
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			
Nectarine	Thrips	1/2 - 1	1	72 hrs.

CA & AZ only	Do not apply more than 3 pounds crop. Do not make more than 3 applications in the content of th		P INSECTICIDE per acre per	
Onions (Green & Dry Bulb)	Beet Armyworm Thrips* Variegated Cutworm Black Cutworm	1/2 - 1**	7 - Green and Dry Bulb Onions	
	Onions, green Do not apply more than 6 pounds of crop. Do not make more than 8 application is 5 days. Onions, dry bulb Do not apply more than 4 pounds of crop. Do not make more than 8 application. Do not make more than 8 application to control the crop. The chemigation to control the control of the crop. The chemigation to control the crop. The chemigation to control the crop. The chemigation to control the crop. The chemical states of the control of the crop. The chemical states of the control of the crop. The chemical states of the control of the crop. The chemical states of the control of the crop. The chemical states of the control of the crop. The chemical states of the control of the crop.	ons per crop; minimum int of ROTAM METHOMYL 90S plications per crop; minimu L 90SP INSECTICIDE may be rips. Begin applications bef results, add a wetting ager //IGATION section for more	erval between treatments P INSECTICIDE per acre per im treatment interval e applied by overhead fore thrip populations int. Apply in 0.1 to 0.2	48 hrs.
Oranges CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Fruit-tree Leafroller Beet Armyworm Citrus Cutworm	1/2 - 1	1	72 hrs.
	Do not apply more than 3 pounds of crop. Do not make more than 4 applications.		P INSECTICIDE per acre per	

				Page ZZ Of Z
Peaches	Cat-facing Insects (Plant Bugs and Stink Bugs) - Begin at petal fall and continue in cover sprays at 7- to 10-day intervals. Oriental Fruit Moth* - Begin at petal fall; use trapping devices and frequent field inspection to determine need for treatment. Continue treatment in cover sprays and alternate with residual-type insecticides registered for this use. Green Peach Aphid Do not apply more than 6 pounds of ROT.	1 lb. (or 1/4 lb. per 100 gals. up to 400 gals. per acre) AM METHOMYL 90SP IN	4 SECTICIDE per acre per	4 days
	crop. Do not make more than 6 applications pe *Oriental Fruit Moth (Ground Application			
Peanuts	Corn Earworm* Potato Leafhopper Fall Armyworm Beet Armyworm	1/4 - 1 3/8 - 1		
	Green Cloverworm Velvetbean Caterpillar Cabbage Looper Soybean Looper** Thrips Granulate Cutworm	1/2 - 1	21	48 hrs.
	Do not apply more than 4 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 8 applications per crop. *ROTAM METHOMYL 90SP INSECTICIDE has ovicidal and larvicidal control on corn earworm. **Soybean Looper is difficult to control. Do not apply to worms greater than 1 per 2" long. Use higher rate for severe infestations. Do not feed treated vines.			
Pears Northeast only	Green Fruitworm Oblique banded Leafroller	1/2 - 1*	7	
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop. *Apply in a minimum of 50 gallons of water per acre.			48 hrs.
Peas (succulent) Including: Pigeon peas, Chick peas, Garbanzo beans,	Alfalfa Looper Cabbage Looper* Pea Aphid Beet Armyworm Saltmarsh Caterpillar Variegated Cutworm	1/2 - 1	1 - Peas 5 - Forage 14 - Hay	48 hrs.
Dwarf peas, Garden peas, Green peas,	Alfalfa Caterpillar Armyworm Green Cloverworm	1/4 - 1		

peas, Edible pod peas	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 6 applications per crop; minimum interval between treatments is 3 days. *Do not use for Cabbage Loopers in AL & GA.				
Pecans	Aphids	1/2 - 1	30		
Southeast only	Do not apply more than 7 pounds of ROTAM METHOMYL 90SP INSECTICIDE/acre/crop. Do not make more than 7 applications per crop.				
Peppers Including: Bell, Hot, Pimentos, Sweet	Loopers Beet Armyworm Green Peach Aphid Armyworm Fall Armyworm	1/2 - 1	3		
	Variegated Cutworm European Corn Borer	1/4 - 1/2			
	per crop.	not apply more than 3.6 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre rcrop. not make more than 8 applications per crop.			
Pomegranates	Omnivorous Leafroller	1	14		
	Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 2 applications per crop.			48 hrs.	
Potato	Tuberworm*				
Potato	Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 - 1	6		
Potato	Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm Variegated Cutworm	1/2 - 1	6		
Potato	Loopers Aphids Beet Armyworm Leafhoppers Fall Armyworm	1/2 . of ROTAM METHOMYL 90SP II tions per crop. 90SP INSECTICIDE may be ap- ults, use the highest listed rat- oly in 0.1 to 0.2 inches of water ETHOMYL 90SP INSECTICIDE of worm populations. An applicate modes of action may be need a possible prior to harvest to a dequately control tuberworm	NSECTICIDE per acre per plied by overhead e of ROTAM er per acre. See on a 5-7 day schedule, or ation schedule of ded to keep foliar reduce the risk of larval	48 hrs.	

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Including: Sorghum Midge - Apply when 50% Sudangrass (Except bloom and 3-5 days later if needed. Sweet Sorghum) Fall Armyworm (Budworm) 1/4 - 1/2* Beet Armyworm Corn Earworm Armyworm Do not apply more than 1 pound of ROTAM METHOMYL 90SP INSECTICIDE per acre per Do not make more than 2 applications per crop. *Minimum of 10 gallons per acre by ground or 2 gallons per acre by air. **Do not apply within 14 days of feeding forage or cutting for hay. Soybeans Green Cloverworm Velvetbean Caterpillar 1/8 - 1/4 Mexican Bean Beetle (See Insect Predator Corn Earworm section) **Light to Moderate infestations** Moderate to severe infestations 1/4 - 1/2 Soybean Aphid 1/6 - 1/3 14 - Soybeans 3 - Forage Beet Armyworm Saltmarsh Caterpillar 12 - Hay 48 hrs. Bean Leaf Beetle Fall Armyworm 1/4 - 3/8 Thrips Silver Spotted Skipper Light to Moderate infestations Moderate to severe infestations 3/8 - 1/2 Do not apply more than 1.5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 3 applications per crop. Spinach Alfalfa Loopers Cabbage Looper 1/2 - 1 Beet Armyworm 48 hrs. Fall Armyworm Variegated Cutworm 1/2

	Do not apply when minimum daily tempe		wer.	Page 25 Of
	Do not apply to seedlings less than 3" dia Do not apply more than 4 pounds of ROT crop. Do not make more than 8 applications not	AM METHOMYL 905	SP INSECTICIDE per acre per	
	Do not make more than 8 applications pe	er crop.		
Sugar Beet	Beet Webworm Flea Beetles Carrion Beetles Beet Armyworm* Aphids* Western Yellowstriped Armyworm*	1/4 - 1	30 - Tops 21 - Roots	
	Variegated Cutworm	1/2		
	Do not apply more than 5 pounds of ROT crop. Do not make more than 10 applications p *Chemigation: ROTAM METHOMYL 90SP sprinkler chemigation to control beet arm armyworm. For best results, use the high INSECTICIDE. Apply in 0.1 to 0.2 inches of more information.	per crop. INSECTICIDE may be nyworm, aphids and est listed rate of RO	e applied by overhead western yellowstriped TAM METHOMYL 90SP	48 hrs.
Summer Squash* Including: Crookneck squash, Straightneck squash, Scallop squash, Vegetable marrow, Spaghetti squash, Hyotan, Cucuzza, Hechima, Chinese okra, Bitter melon, Balsam pear, Balsam apple, Chinese Cucumber	Loopers Tobacco Budworm Beet Armyworm Yellowstriped Armyworm Granulate Cutworm Flea Beetles Cucumber Beetles Melon Aphid Melonworm Pickleworm Fall Armyworm Do not apply more than 6 pounds of ROTA per crop.	1/2 - 1 AM METHOMYL 909	1/2 lb 1 day Over 1/2 lb 3 days P INSECTICIDE per acre	48 hrs.
		ly that are consume picked cannot be sto	ored, has a soft rind which	
Tangelo, Tangerine CA, AZ & HI only	Thrips Western Tussock Moth Orange Tortrix Beet Armyworm	1/2 - 1	1	72 hrs.
	Do not apply more than 3 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 4 applications per crop.			
Fobacco .	Flea Beetle Hornworm	1/4 - 1/2	5 - Flue cured	48 hrs.

(Except shade)	Loopers Aphids Tobacco Budworm Fall Armyworm	1/2	14 - Air or fire cured	Page 26 of ;
	Do not apply more than 2.5 pounds of per crop. Do not make more than 5 applications		P INSECTICIDE per acre	
Tomato (Including Tomatillos*)	Tomato Fruitworm Aphids Hornworm Loopers Beet Armyworm Southern Armyworm Pinworm Armyworm Fall Armyworm	1/2 - 1	1	48 hrs.
	Variegated Cutworm 1/2 Do not apply more than 7 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 16 applications per crop. *For tomatillos do not apply more than 5 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop. Do not make more than 5 applications per crop.			70 1113.
Furf For use on sod farms only)	Sod Webworm (after application, sprinkle irrigate for 15 minutes) Do not apply more than 4 pounds of RC	1 (2/5 oz. per 1,000 sq. ft.) DTAM METHOMYL 90SP I	NSECTICIDE per acre per	
	crop. Do not make more than 4 applications Do not graze or feed.	per crop.		48 hrs.
Wheat States of Idaho,	Armyworms Cereal Leaf Beetle* Aphids**	1/4 - 1/2	7	48 hrs.

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Oregon, and
Oregon, and Washington only)

Do not apply more than 2 pounds of ROTAM METHOMYL 90SP INSECTICIDE per acre per crop.

Do not make more than 4 applications per crop.

Chemigation: ROTAM METHOMYL 90SP INSECTICIDE may be applied by overhead sprinkler chemigation. For best results, use the highest listed rate of ROTAM METHOMYL 90SP INSECTICIDE.

Apply in 0.1 to 0.2 inches of water per acre. See CHEMIGATION section for more information.

*Cereal leaf beetle: ROTAM METHOMYL 90SP INSECTICIDE can provide contact ovicidal effect on cereal leaf beetle eggs when applied according to label directions. Application should be timed to correspond with the appearance of newly laid eggs or in anticipation of egg hatch to achieve maximum ovicidal effect. Use on this pest stage (egg) is not currently registered in California.

**Aphids: For aphid control, crop must be actively growing and not under stress from adverse environmental conditions (such as, extreme temperatures or drought). Applications to s on Russian wheat aphid need to begin when aphid population is low (<10 adults per stem).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Handle this package carefully to prevent breakage of inner bag when stored at low temperatures. Allow to warm above 50°F for normal handling. Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage. Not for use or storage in or around the home. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

For Water Soluble Packets: Do not reuse the outer box or the resealable plastic bag. When all water-soluble packets are used, the outer packaging should be clean and may be disposed of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by open burning. If burned, stay out of smoke. If the resealable plastic bag contacts the formulated product in any way, the bag must be triple-rinsed with clean water. Add the rinsate to the spray tank and dispose of the outer wrap as described above.

For Paper and Plastic Bags: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In the event of a major spill, fire or other emergency, call CHEMTREC Day or Night, 1-800-424-9300.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Rotam Agrochemical Company Limited or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Rotam Agrochemical Company Limited and Seller harmless for any claims relating to such factors.

Rotam Agrochemical Company Limited warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Rotam Agrochemical Company Limited, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW ROTAM LTD MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, Rotam Agrochemical Company Limited or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ROTAM AGROCHEMICAL COMPANY LIMITED AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ROTAM AGROCHEMICAL COMPANY LIMITED OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Rotam Agrochemical Company Limited and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by a duly authorized representative of Rotam Agrochemical Company Limited.

Manufactured For [By]:

Rotam Agrochemical Co., Ltd. 26/F E-Trade Plaza 24 Lee Chung Street Chaiwan, Hong Kong Federal eRulemaking Portal: http://www.regulations.gov. Follow the online instructions for submitting comments.
 Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute.

 Mail: OPP Docket, Environmental Protection Agency Docket Center (EPA/DC), (28221T), 1200 Pennsylvania Ave. NW., Washington, DC 20460-0001.

• Hand Delivery: To make special arrangements for hand delivery or delivery of boxed information, please follow the instructions at http://www.epa.gov/dockets/contacts.html.

Additional instructions on commenting or visiting the docket, along with more information about dockets generally, is available at http://www.epa.gov/dockets.

FOR FURTHER INFORMATION CONTACT: Tom Myers, Pesticide Re-Evaluation Division (7508P), Office of Pesticide Programs, Environmental Protection Agency, 1200 Pennsylvania Ave. NW., Washington, DC 20460–0001; telephone number: (703) 308–8589; email address: myers.tom@epa.gov.

SUPPLEMENTARY INFORMATION:

I. General Information

A. Does this action apply to me?

This action is directed to the public in general, and may be of interest to a wide range of stakeholders including environmental, human health, and agricultural advocates; the chemical industry; pesticide users; and members of the public interested in the sale, distribution, or use of pesticides. Since others also may be interested, the Agency has not attempted to describe all the specific entities that may be affected by this action.

B. What should I consider as I prepare my comments for EPA?

- Submitting CBI. Do not submit this information to EPA through regulations.gov or email. Clearly mark the part or all of the information that you claim to be CBI. For CBI information in a disk or CD-ROM that you mail to EPA, mark the outside of the disk or CD-ROM as CBI and then identify electronically within the disk or CD-ROM the specific information that is claimed as CBI. In addition to one complete version of the comment that includes information claimed as CBI, a copy of the comment that does not contain the information claimed as CBI must be submitted for inclusion in the public docket. Information so marked will not be disclosed except in accordance with procedures set forth in 40 CFR part 2.
- 2. Tips for preparing your comments. When preparing and submitting your comments, see the commenting tips at http://www.epa.gov/dockets/comments.html.

II. Background on the Receipt of Requests To Amend Registrations to Delete Uses

This notice announces receipt by EPA of requests from registrants to delete certain uses of methomyl product registrations. Methomyl is a broadspectrum carbamate insecticide registered for use on a wide range of field crops, vegetables, fruits, and turf. In letters to EPA, the registrants have requested EPA to amend their methomyl product labels to delete certain uses of their pesticide product registrations identified in Table 1 of Unit III. Specifically, the registrants have submitted letters to EPA to voluntarily amend their methomyl product registrations to delete the use of methomyl in or on barley, oats, and rye. This action on the registrant's requests will terminate the last methomyl pesticide products registered in the United States for these uses.

III. What action is the Agency taking?

This notice announces receipt by EPA of requests from registrants to delete certain uses of methomyl product registrations. The affected products and the registrants making the requests are identified in Tables 1 and 2 of this unit.

Unless a request is withdrawn by the registrant or if the Agency determines that there are substantive comments that warrant further review of this request, EPA intends to issue an order amending the affected registrations.

TABLE 1-METHOMYL PRODUCT REGISTRATIONS WITH PENDING REQUESTS FOR AMENDMENT

Registration No.	Product name	Company	Uses to be deleted
352–342	Dupont Lannate SP Insecticide Dupont Methornyl Composition Dupont Methornyl Technical Dupont Lannate LV Insecticide Annihilate LV Annihilate SP Methornyl Technical Rotam Methornyl Technical Methornyl 29% SL Insecticide Methornyl 90% SP Rotam Methornyl 29 LV Insecticide Rotam Methornyl 90 SP Insecticide	Dupont Dupont Dupont Dupont Dupont MacDermid Agricultural Solutions MacDermid Agricultural Solutions Sinon Corporation Rotam Limited Sinon USA Inc. Sinon USA Inc. Rotam Agrochemical Company, Ltd Rotam Agrochemical Company, Ltd	Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye. Barley, Oats, Rye.

Table 2 of this unit includes the names and addresses of record for the

registrants of the products listed in sequence by EPA company number.

This corresponds to EPA registration numbers in Table 1 of this unit.

TABLE 2-REGISTRANTS REQUESTING VOLUNTARY AMENDMENTS

ЕРА Сотралу №.	Company name and address		
352	E. I. Du Pont de Nemours and Company, 1007 Market Street, Wilmington, DE 19898-0001.		
400	MacDermid Agricultural Solutions, Inc., c/o Chemtura Corporation, 199 Benson Road, Middlebury, CT 06749.		
70552	Sinon Corporation, c/o Biologic, Inc., 115 Obtuse Hill Road, Brookfield, CT 06804.		
81598	Rotam Limited, c/o Wagner Regulatory Associates, Inc., P.O. Box 640, 7217 Lancaster Pike, Suite A, Hockessin, DE 19707.		
82557	Sinon USA Inc., c/o Biologic, Inc., 115 Obtuse Hill Road, Brookfield, CT 06804.		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Methomyl (090301): Risk Mitigation Decision for Risks Due to Drinking Water Concerns

Summary

This document presents the mitigation measures that methomyl technical and end user registrants Chemtura Corporation, E.I. DuPont de Nemours and Company (DuPont), Glades Formulating Corporation, Rotam Limited, and Sinon Corporation, have voluntarily agreed to implement in order to mitigate estimated dietary risk due to drinking water exposure. To ensure timely implementation of the changes to several crops regarding number of applications and maximum seasonal rate, EPA is taking steps to make sure that the new use restrictions appear on all methomyl product labels by the end of 2014.

The mitigation measures will cancel the use of methomyl on barley, oat, and rye and restrict its use on wheat to Idaho, Oregon, and Washington. For celery, head lettuce, and peppers the number of applications will be reduced by 20% and the seasonal maximum rate will be reduced by 12% to 20%. For corn, language will be added to labels that will change the timing of applications such that only two applications can occur prior to tassel push, at the 1-2 leaf stage, and applications will no longer be able to occur on bare soil. Additionally, the number of applications for leaf lettuce, field corn, popcorn, and seed corn will be reduced 25% to 50%. While Florida and California were the areas of greatest concern for risks to drinking water, the registrants have agreed to implement the initigation nationwide.

While the risk assessment phase of registration review for methomyl is only just beginning, this effort to mitigate a chemical's risks early in the registration review process is consistent with the Agency's approach to registration review. Where risks are identified early in the process and opportunities for early mitigation exist, the Agency will pursue those opportunities as they arise, rather than waiting for completion of a chemical's registration review in order to mitigate risks.

Background

Methomyl is an N-methyl carbamate insecticide currently registered for use on a wide variety of sites including field, vegetable, orchard crops, and on turf (sod farms only). Methomyl is generally a restricted use pesticide [based on percent active ingredient (a.i.)]. There are currently no homeowner uses. However, certain low percentage a.i. formulations are not designated as restricted use and can be used around livestock quarters, commercial premises, and refuse containers. Methomyl was first registered in the United States in 1968. A Reregistration

Eligibility Decision (RED) was completed in 1998¹. Methomyl is the primary metabolite of thiodicarb, which is also an insecticide.

Methomyl is currently undergoing registration review, EPA's periodic reevaluation of all registered pesticides to ensure that they continue to meet the statutory standard of no unreasonable adverse effects. The risk assessment phase of registration review for methomyl begins in mid-2014 with the release for public comment of the draft risk assessments anticipated in the summer of 2015.

Results of the Agency's Dietary Risk Assessment

The Agency's dietary risk assessment included drinking water exposure estimates that used the most refined regional percent cropped area (PCA) factors consistent with recommendations from the Scientific Advisory Panel's² peer review. This resulted in a number of methomyl uses which caused the human health dietary assessment to indicate potential risk of concern. The approach used for evaluating and characterizing the drinking water exposure concerns for methomyl are consistent with the approach used during the mitigation of oxamyl drinking water risks of concern.³ This stands in contrast to the assessment provided by DuPont⁴, which explored crop-by-crop and region-by-region PCA factors. While DuPont's analysis looked at PCAs on a finer scale using the available data, their approach is not currently an Agency approved approach nor has their approach been informed by an SAP review, and thus, could not be used quantitatively in the Agency's assessment.

The Agency looked at its drinking water simulations in the context of recent methomyl usage data in an effort to further characterize the risk. See Appendix A for "Methomyl – Summary of Agency Drinking Water Assessment and Discussion of Risk Management Options", which lays out the risk management analysis and options for resolution. In general, methomyl's use, regardless of crop, appears to occur predominantly in the southeast (primarily Florida and Georgia), the three west coast states (California, Washington, and Oregon), the southwest (Texas and Arizona), and the northeast (New York, Pennsylvania, and New Jersey). More specifically, geographically on a state-by-state basis, methomyl's use in Florida and California significantly exceeds its use in any other state. In fact, methomyl's use in those two states exceeds its use in all the other states combined.

The usage data also suggested that the application rate, retreatment intervals, and number of applications could be reduced below that on currently registered product labels in order to reduce drinking water exposure. In addition, the usage data indicated that methomyl has very

¹ Available at http://www.epa.gov/oppsrrd1/REDs/0028red.pdf.

² U.S. EPA (1999). Scientific Advisory Panel Report - Sets of Scientific Issues Being Considered by the Environmental Protection Agency Regarding: Session III - Use of Watershed-derived Percent Crop Areas as a Refinement Tool in FQPA Drinking Water Exposure Assessments for Tolerance Reassessment. Available at http://www.epa.gov/scipoly/sap/meetings/1999/may/final.pdf.

³ U.S. EPA (2011) Oxamyl Mitigation of Dietary (Drinking Water) Risks of Concern for Certain Use Sites. Available at http://www.regulations.gov/#!documentDetail;D=EPA-HO-OPP-2010-0028-0021.

⁴ N. Snyder, A. Klemens, K. Wright, S. Zelonis. Sponsored by E. I. du Pont de Nemours and Company. Tier 2 Dietary and Drinking Water Risk Assessment for Methomyl Under Current Use Guidance. June 7, 2012. MRID 48859101.

little use on several major row crops. Removal of these crops from the methomyl label will reduce the estimated drinking water concentrations in the nationwide risk assessment, and could open up room in the risk cup for methomyl and the n-methyl carbamate cumulative assessment.

Registrant Agreed-to Mitigation

Based upon the registrant agreed to mitigation, identified in Tables 1 and 2 below, which cancels some uses and reduces the number of applications and the seasonal maximum rate for some crops, drinking water concerns have been sufficiently mitigated at this time. While Florida and California were identified as the areas where we were most concerned about drinking water risk because most of the methomyl use occurs in those two states, the registrants have agreed to implement the mitigation nationwide. See Appendix B for the Agency's complete analysis supporting the sufficiency of the mitigation to address drinking water concerns in Florida and California.

Table 1. Agreed-to Mitigation for Methomyl on Row Crops

Labeled Crop	M	itigation			
Barley	Cancel Use				
Oats	Ca	ncel Use			
Rye	Ca	ncel Use			
Wheat	Cancel Use Exce	ept in ID, OR, and WA			
	Number	of Applications			
	Cutrent*	Proposed			
Corn, Field	10	5			
Corn, Pop	10	5			
Corn, Seed	10	5,			
Corn, Sweet, Field, Pop, and Seed	applications to corn pricapplication when corn i	Do not make more than two or to tassel push. Make 1 s at 1-2 leaf stage for control take a second application, if			

Table 2	Agreed to	Mitigation	for Methomy	l on Vegetables
Laure L.	WEI CCO.IO	MILLEGUION	TOR TARCETTONING	ton vegetables

2	Number of Applications Seasonal Maximum Rate (lb			n Rate (lbs a.i./Acre)
Crop	Current*	Proposed	Current*	Proposed
Celery	10	8	7.2	6.3
Head Lettuce	15	12	7.2	6.3
Leaf Lettuce	8	6	3.6	3.6
Peppers	10	8	4.5	3.6

^{*}Currently on labels.

Conclusion

This document presents the mitigation measures being taken voluntarily by registrants in order to mitigate estimated dietary risk due to drinking water exposure from methomyl. The Agency believes that these reductions in the maximum seasonal label rates for methomyl

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mitigate our concerns about dietary risk due to drinking water exposure from methomyl. This and all other documents related to methomyl registration review are located at http://www.regulations.gov under docket number EPA-OPP-2010-0751.

Richard P. Keigwin, Jr.

Director

Pesticide Re-evaluation Division

APPENDIX A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

SENT VIA EMAIL

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

To: Patricia G. Devine, Product Registration Manager

DuPont Crop Protection

Re: Methomyl - Summary of Agency Drinking Water Assessment and Discussion of Risk

Management Options

Date: March 20, 2013

This document highlights results of EPA's dietary risk assessment for methomyl as it relates to specific crops and areas of the country. It is our effort to note the differences between DuPont's drinking water assessment and the Agency's assessment because these differences result in a number of dietary risk levels-of-concern exceedances in EPA's assessment. At the same time, from a risk management perspective, possible options for mitigating the risks are discussed.

Results of the Agency's Dietary Risk Assessment

Our risk assessors evaluated the potential dietary risk of methomyl using PRZM/EXAMS to simulate drinking water exposure, and DEEM to combine exposure through residues on food with drinking water exposure. The team ran PRZM/EXAMS simulations for most methomyl crops using the representative standard scenario for a national assessment, as well as a number of additional regional assessments. In addition, drinking water exposure was calculated for a number of scenarios using the lowest regional percent crop treated (PCA) for regions east of the eastern divide and west of the western divide (0.13), and using the lowest regional PCA for mid-continent regions (0.35). These were considered lower-bound values to compare with the representative scenarios and PCAs shown in Table 1, below.

EPA's approach to the methomyl drinking water assessment uses the same inputs (rates, number of applications and retreatment intervals) as DuPont used in its assessment (June 7, 2012), but did not calculate crop and watershed-specific PCA factors. EPA's use of PCAs in its drinking water assessment is consistent with the approach discussed in the 1999 Scientific Advisory

Panel's report⁵ on this subject. The PCAs shown in the table below are regional PCAs associated with the standard scenarios chosen to represent nationwide methomyl use allowed by its labels.

Due to the difference in how the regional PCAs are utilized in EPA's assessment, a number of crops exceed the level of concern for dietary risk although they passed in DuPont's assessment. As a rule of thumb, estimated drinking water concentrations above 10 ppb resulted in failure of the DEEM aggregate simulation. Of the example crops listed in Table 1, only apples and potatoes passed using the PCAs presented.

Table 1			 คือการรถบลิเพตร์สารุกที่จะใช้ 	
(Grop:	Secentify highest matternales, destanding order	Paration	Permeter SW Grand	
Lettuce	CA, AZ	CA lettuce STD	99.31 (0.61)	
Onion	OR, WA, CA, ID, NY, TX, CO	GAOnion_WirrigSTD	39.80 (0.41)	38.89 (0.41)
Sweet Corn	FL, GA, CA, NY, PA, NJ, OH, MI, IL, WI	KS Corn STD	127.54 (0.87)	124.93 (0.87)
Tomatoes	CA, FL	FL tomato STD	37.50 (0.41)	36.82 (0.41)
Potatoes	WA, CA, OR, NY, PA, NC	ME potato STD	3.95 (0.13)	4.06 (0.13)
Peppers	FL, AZ, CA, NJ, GA, NC, OH	FL pepper STD	50.79 (0.41)	49.22 (0.41)
Cabbage	FL, NC, NY, TX, CA, CO, AR, MI	Brownsville TX	74.24 (0.69)	
Apples	VA, MI, WV, PA, NY, OH, NC	PA apples STD V2	8.38 (0.34)	8.52 (0.34)
Alfalfa	CA, CO	ground TX alfalfaOP; aerial NC alfalfa OP	81.08 (0.69)	11.81 (0.41)
Beans (Snap, Bush, Pole, String)	FL, TX, GA, CA, PA, WI	MI beans STD	72.28 (0.81)	71.15 (0.81)
Peaches	NJ, AL, PA, MI, CA	GA Peaches STD	11.23 (0.41)	11.62 (0.41)
Celery	CA, MI	CA cole crop RLF v2	86.68 (0.61)	

^{*}Where there is a ground and aerial peak ppb and PCA, unless indicated, the scenario is for both ground and aerial

The consideration of default regional PCAs represents the extent of refinement that could be done for the drinking water exposure assessment, given the wide variety of crops on methomyl labels and the fact that there are no geographical limitations for the use of methomyl. However, we have taken a closer look at where methomyl appears to actually be used (geographically and crop specific) based upon our use and usage information from the most recent available 5-year period. Upon this closer evaluation of methomyl's apparent geographical use and predominant crop specific use, there may be options for moving forward to mitigate the issues driving the failure of certain crops.

⁵ U.S. EPA (1999). Scientific Advisory Panel Report - Sets of Scientific Issues Being Considered by the Environmental Protection Agency Regarding: Session III - Use of Watershed-derived Percent Crop Areas as a Refinement Tool in FQPA Drinking Water Exposure Assessments for Tolerance Reassessment. Available at http://www.epa.gov/scipoly/sap/meetings/1999/may/final.pdf.

In general, methomyl's use, regardless of crop, appears to occur predominantly in the southeast (primarily Florida and Georgia), the three west coast states (California, Washington, and Oregon), the southwest (Texas and Arizona), and the northeast (New York, Pennsylvania, and New Jersey). More specifically, geographically on a state-by-state basis, methomyl's use in California and Florida significantly exceeds its use in any other state. In fact, methomyl's use in those two states exceeds its use in all the other states combined.

In addition, the use of methomyl appears to be insignificant for major crops which account for much of the area in default PCA calculations. For instance, the average percent crop treated for spring and winter wheat for the last five years has been 0.0, according to our analysis. The same is true for both soybeans and field corn. Use records suggest that what use has occurred has not been in the same regions where the major methomyl use occurred on sweet corn and vegetables.

Consideration of drinking water exposure in the context of methomyl usage data

Given the usage data described above, we undertook a "what-if" assessment along the lines of that performed for the oxamyl drinking water assessment, exploring which use/region combinations might pose the greatest risk of drinking water contamination. In this risk management exercise we looked at modeling runs that best approximated the areas of major use of methomyl, and applied combined PCA factors for crops on which methomyl has been used, most often those for vegetables and corn (to account for sweet corn). In the cases for which a nearby scenario was not available, we took the results of the national standard scenario and applied the appropriate PCAs for the major use region being evaluated. This exercise does not by itself change the risk assessment nor the status of the methomyl "risk cup." It does, however, clarify which uses most require mitigation for protection of drinking water, and where.

Table 2 indicates which uses failed both with the national representative standard scenario and regional default PCAs, and under the "what-if" scenarios using more representative scenarios and smaller PCA factors. In short, the main drinking water concerns which require resolution are the use of methomyl on sweet corn in Florida and Georgia, the use on vegetables (especially lettuce and brassicas) in California, and the use on onions in New York. The region-specific PCAs include EPA's recently released regional PCA adjustment factors for vegetables along with regional PCAs for other crops for which there was reported methomyl use between 2007 and 2011.

Table 2

·Grop	States:	Scenario	PCA - Region Specific
Sweet Corn	FL, GA	FL sweet corn OP	0.16, 0.30
Lettuce (and spinach)	CA	CA lettuce STD	>0.29
Peppers	CA	FL pepper STD	>0.29

⁶ Available at http://www.epa.gov/oppefed1/models/water/pca_adjustment_dwa.html#_3_regional_group.

Cabbage	CA	CA cole crop RLF v2	>0.29
Celery	CA	CA cole crop RLF v2	>0.29
Onions	NY	GAOnion_WirrigSTD	Up to 0.41

Options for Moving Forward

Sweet corn in Florida and Georgia

Methomyl's major uses in Florida appear to be on vegetables and sweet corn, with no reported use on wheat, soybeans, citrus, or field corn. A Florida sweet corn scenario was run with the default regional PCA of 0.41, which resulted in residues that caused the human health aggregate assessment to fail. In looking at the regional vegetable PCA, the maximum is 0.07 and the maximum for corn is 0.09. If one were to conservatively combine these two maximum PCA factors, recognizing that the corn value may in part represent land cropped to field corn, the resulting drinking water concentration is near to that which would result in an acceptable dietary risk.

The major use of methomyl in Georgia is on sweet corn, with lesser amounts used on vegetables and cotton. According to 2007 Census of Agriculture maps, major cotton, vegetable and sweet corn growing areas coincide in the southwestern portion of the state. When considered with the additional reported use on watermelons and cantaloupe, the default regional PCA could be as high as 0.30, but in any case would be higher than that needed to result in acceptable dietary risk.

Methomyl usage data for sweet corn suggest that actual usage is significantly less than modeled by both the Agency and DuPont. Modeled concentrations for sweet corn were derived using an application rate of 0.45 lb/A applied 14 times with a 1-day application interval. Usage data indicate that the average application rate in Florida and Georgia was 0.3 lb/A, with an average of about 9 applications a year. It appears that there is room to reduce the rate, number of applications and perhaps application interval to reduce the potential for risk to drinking water.

Vegetables in California

<u>Lettuce</u>: Lettuce would fail using the California lettuce scenario and the regional vegetable PCA of 0.29 alone, which does not account for reported use on sweet corn, cotton and citrus crops. The lettuce scenario was also used to represent use on spinach, which therefore also would fail in this "what-if" exercise.

Methomyl usage data for lettuce suggest that actual usage is significantly less than simulated by both the Agency and DuPont. Modeled concentrations for lettuce were derived using an application rate of 0.9 lb/A applied 6 times a year with a 2-day application interval. Usage data indicate that the average application rate in California was 0.8 lb/A, with an average of about 2 applications a year. It appears that there is room to reduce the number of applications and perhaps the interval to reduce the potential for risk to drinking water.

Peppers: Because there is not a standard scenario for California peppers, we considered the Florida pepper scenario deemed representative by EPA for this exercise. DEEM calculated exposure of 103% of the aPad for a PCA of 0.35 (one of the bounding assumptions explored as described above). Given the regional PCA of 0.29 for vegetables, and the use of methomyl on sweet corn, cotton and citrus in the same region of California, one cannot dismiss risk from peppers in this "what-if" exercise.

Methomyl usage data for peppers suggest that actual usage is significantly less than modeled by both the Agency and DuPont. Modeled concentrations were derived using an application rate for peppers of 0.9 lb/A applied 5 times a year with a 5-day application interval. Usage data indicate that the average application rate for peppers in California was 0.7 lb/A, with an average of about 2 applications a year. It appears that there is room to reduce the rate, number of applications and perhaps application interval to reduce the potential for risk to drinking water.

<u>Cabbage</u>: A California standard scenario was available for cabbage, and it resulted in higher peak concentrations than the scenario chosen as representative of the rest of the country. DEEM calculated exposure of 102% of the aPad for a lower-bound PCA of 0.13. California cabbage would therefore still fail with a regional vegetable PCA of 0.29, and more so if one considered use of sweet corn, cotton and citrus crops in the PCA.

Methomyl usage data for cabbage suggest that actual usage is significantly less than modeled by both the Agency and DuPont. Modeled concentrations were derived using an application rate for cabbage of 0.9 lb/A applied 8 times a year with a 2-day application interval. Usage data indicate that the average application rate in California for cabbage was 0.7 lb/A, with an average of about 2 applications a year. It appears that there is room to reduce the rate, number of applications and perhaps application interval to reduce the potential for risk to drinking water.

<u>Celery:</u> Use on celery was simulated using the same standard scenario as for cabbage, but with a different application interval. DEEM calculated exposure of 97% of the aPad for a lower-bound PCA of 0.13, and exceedance of the aPad from water alone using a PCA of 0.35. Given the regional PCA of 0.29 for vegetables, and the use of methomyl on sweet corn, cotton and citrus in the same region of California, one cannot dismiss risk from celery in this "what-if" exercise.

Methomyl usage data for celery suggest that actual usage is significantly less than modeled by both the Agency and DuPont. Modeled concentrations were derived using an application rate for celery of 0.9 lb/A applied 8 times a year with a 5-day application interval. Usage data indicate that the average application rate for celery in California was 0.7 lb/A, with an average of about 2 applications a year. It appears that there is room to reduce the rate, number of applications and perhaps application interval to reduce the potential for risk to drinking water.

Onions in New York

Usage data indicate that the second most important state for methomyl use on onions is New York. Onions and sweet corn seem to be grown in the same area, much of it in the Great Lakes region, and methomyl use on apples was reported for New York, as well. Drinking water concentrations derived using the representative standard scenario caused the dietary assessment

to fail whether considering a PCA of 0.41 or 0.35. Whether the vegetable and corn PCAs for Region 2 or Region 4 are considered for New York, one cannot dismiss the potential for dietary risk with this "what-if" scenario. However, while the usage data for onions indicates that the 0.9 lb/A rate modeled in the modeling is the actual average use rate for New York, the average of 3 applications per year is half the 6 applications simulated in the modeling.

Do low-benefit uses need to be retained?

As described above, a risk management exercise considering PCA factors without the inclusion of major row crops was only possible because our usage data indicate that methomyl is not used much on these crops. The average percent crop treated for wheat, soybeans and corn all were calculated to be 0.0 for the most recent 5-year period reviewed, suggesting that there is little benefit associated with these methomyl registrations. However, these crops do contribute greatly to the national and regional default PCAs used for the human health dietary risk assessment. We suggest that DuPont consider removing these registered uses from methomyl labels to provide room in the "risk cup" for the existing high-use crops, and perhaps the n-methyl carbamate cumulative assessment.

Conclusion

The Agency's dietary risk assessment included drinking water exposure estimates that used the most refined regional PCA factors that are permissible by the recommendations provided through SAP peer review. This results in a number of methomyl uses which cause the human health dietary assessment to indicate potential risk of concern. This stands in contrast to the assessment provided by DuPont, which explored crop-by-crop and region-by-region PCA factors that are not consistent with SAP recommendations.

The Agency looked at its drinking water simulations in the context of recent methomyl usage data as a risk management exercise. Identification of where methomyl was used most, and on which crops, allowed us to perform a "what-if" evaluation consistent with that done for oxamyl. Through this we identified which crop-location combinations would still result in estimated dietary risk due to drinking water exposure.

The usage data used in this exercise also suggests that the application rate, retreatment intervals, and number of applications for these crops could be reduced below that modeled in order to reduce drinking water exposure. In addition, the usage data indicate that methomyl has very little use on several major row crops. Removal of these crops from the methomyl label would go a long way in reducing the estimated drinking water concentrations in the nationwide risk assessment, and could open space in the risk cup for methomyl and the n-methyl carbamate cumulative assessment.

APPENDIX B

Analysis Indicating Sufficiency of Mitigation to Address Drinking Water Risk Concerns in Florida and California

Florida

The main concern for possible methomyl in drinking water in Florida is associated with use on vegetables. Although it can be used on orchard crops, usage data available to the Agency does not indicate use in Florida.

In its response to the Agency's request, DuPont provided information on the co-occurrence of other potential methomyl crops in areas of Florida where vegetables are grown. These maps indicate that sweet corn is grown more in Georgia and up the southeastern seaboard than in Florida. USDA Agricultural Census maps from 2007 indicate that vegetables and sweet corn are both grown in Palm Beach County (most likely the Everglades Agricultural Area. However, as indicated by the Palm Beach County Water Utilities Department's 2012 report, "Palm Beach County Water Utilities Department's drinking water is drawn from wells extending approximately 150 feet underground."

Furthermore, the City of West Palm Beach, in their 2012 report, indicated that "the City of West Palm Beach gets its water from rainfall captured and stored in a part of the Everglades Ecosystem known as the Grassy Waters Preserve. This system feeds and sustains Lake Mangonia and Clear Lake. In past years the City has, at times, been able to supplement its water supply from Lake Okeechobee." It states further that "in 2012 the Florida Department of Environmental Protection performed a Source Water Assessment on our system. These assessments were conducted to provide information on any potential sources of contamination in the vicinity of our wells and source water intake. A search of the data sources indicated no potential sources of contamination within the assessment area for our system."

The DuPont response also provided information on potential co-occurrence of vegetables with alfalfa and pasture grass. This memo did not indicate co-occurrence with alfalfa, which is consistent with usage data available to the Agency. There is co-occurrence of pastureland in watersheds in which vegetables are grown, but the predominant pasture grass grown in Florida is bahia grass, and methomyl is only labeled for use on bermudagrass.

The Agency believes that, to the extent that surface water is used as a drinking water source in Florida, that potential drinking water exposure to methomyl is best characterized by the use on vegetables. The proposed reduction in the maximum label rates for methomyl use on vegetables is sufficient to mitigate concerns for drinking water in Florida for methomyl itself. The potential cumulative exposure to methomyl and other n-methyl carbamates is currently being reassessed.

California

When the Agency first identified use on vegetables in California and Florida as the most likely causes of significant drinking water exposure to methomyl, it was based on available methomyl

usage data and the use of a 0.29 percent cropped area (PCA) factor for vegetables in California. DuPont responded by pointing out that the most appropriate PCA for vegetables in Region 18 (which includes California) is 0.10, and the Agency agreed. DuPont calculated that, when this PCA was used and DEEM run considering "eating occasion exposure," the use on vegetables resulted in acceptable aggregate exposure.

While the PCA for vegetables is 0.10, it is important to consider other crops on which methomyl is registered. The orchard crop group could be important in California, except that 1) the PCA for orchards includes use on grapes, for which methomyl is no longer registered, and 2) the assessment for the various orchard crops passed the dietary screen. In addition, available data indicate that a small amount of methomyl is used on orchard crops in California, and only on a small percentage of the crops grown. Use on cotton also is much less significant than on vegetables, with a very small percentage of the crop in California treated.

The Agency acknowledged that the corrected PCA for vegetables improved the picture for drinking water exposure to methomyl in California, but requested additional information on potential co-occurrence with areas in which alfalfa is grown, even though the assessment for alfalfa itself passed the dietary screen. DuPont provided information on the co-occurrence of alfalfa and vegetables in California watersheds, which indicated that the percent cropped to alfalfa in the great majority of watersheds in California was below 5%, with a maximum of 9.6%. The highest PCAs for alfalfa do not correspond with the maximum PCAs for vegetables. Furthermore, while there is a significant amount of methomyl used on alfalfa in California, the percent of the crop treated is only around 10%.

Therefore, while DuPont indicated that the dietary assessment for vegetables would pass if one applies the vegetable PCA of 0.10 to the drinking water exposure values for vegetables, the PCA should perhaps be adjusted slightly higher for use on alfalfa. However, it is important to acknowledge that the screening drinking water exposure values were derived using the highest application rates, maximum number of applications and shortest retreatment intervals allowed on the labels. Usage data for California indicate that less methomyl is applied in practice, and the percent of each crop treated is significantly less than the 100% assumed in the screen. The proposed reduction in the maximum label rates for methomyl use on vegetables is sufficient to mitigate concerns for drinking water in California for methomyl itself. The potential cumulative exposure to methomyl and other n-methyl carbamates is currently being reassessed.

Pages 167-182 *Confidential Statement of Formula May be Entitled to Confidential Treatment*